As of: November 29, 2018 **Tracking No.** 1k2-93sh-u7m9 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0089</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: JAMES BANNERMAN

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93sh-fqfi Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0090</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Ray Valek

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93si-n5bt Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0091</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Leslie Chain

General Comment

That sounds right. Profit from exporting mass murder everywhere.

As of: November 29, 2018 **Tracking No.** 1k2-93si-fgat **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0092</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Bill Miller

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93sj-1q37 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0093</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Todd P Silverstein

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93sj-g89l **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0094</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

So the U.S. is another arms dealer, which used to be outlawed?!

As of: November 29, 2018 **Tracking No.** 1k2-93sj-myxq **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0095</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret StJohn

General Comment

Please, please, please do not transfer oversight of foreign non-military gun sales from the State Department to

the Commerce Department. If we are worried about violent immigrants arriving on our shores, let's don't arm them

before the get here! And if we won't support asylum requests for immigrants, let's don't arm their tormenters in their

home countries. If ever there were an issue that is directly related to homeland security, it is this. And thus not an issue

rightly placed in the purview of the Commerce Department. Moreover, the whole initiative seems a transparent effort by

the gun lobby to increase profits in the industry without regard to public safety. And finally, let's be clear, in no way do I

believe that semi-automatic weapons are not and should not be classified as civilian weapons. I am strongly opposed to

this proposal -- ID: DOS-2017-0046-0001. And we are watching what happens closely.

As of: November 29, 2018 Tracking No. 1k2-93sk-g1vs Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0096</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Ayelet Leibovitch

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

Thank you for your time.

As of: November 29, 2018 Tracking No. 1k2-93sk-thnx Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0097</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Gartner

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93sk-ssdr **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0098</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Follman

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93sk-ek1x **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0099</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Dan Abrams

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93sl-m5j0 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0100</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Debra Aycock

General Comment

I OPPOSE moving export license oversight for firearms from the Department of State to the Department of Commerce.

The proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93sl-dobh **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0101</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Pagano

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93sl-pl1o Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0102</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93sn-b0ej Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0103</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

As of: November 29, 2018 **Tracking No.** 1k2-93sn-t0yu **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0104</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Rainer Gades

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93t2-gald Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0105</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Marsha Olsen

General Comment

Please reverse the proposed regulations that will make it easier to export semi-automatic weapons and ammunition. We should not eliminate Congressional oversight of these sales. There is a reason that we need Congressional oversight in order for ALL American voices to be heard. We must not weaken enduse controls and enable production of 3D weapons anywhere. We have seen the effects of these weapons in U.S. shootings, particularly in our schools. We must not be partly responsible for killings of innocents in other countries. U.S. export controls for weapons used in violence should be made stronger, not weaker.

As of: November 29, 2018 **Tracking No.** 1k2-93t3-1u0w **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0106</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: James DeJager

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93t5-5on7 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0107</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: matthew cazier

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

Thank you,

Matthew Cazier, RN, BSN, CCRN TSICU, HMC 206-744-3510 mcazier@uw.edu

As of: November 29, 2018 Tracking No. 1k2-93t6-yp9t Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0108</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Naya Fross

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93t7-25xg **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0109</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Driscoll

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93t9-xltr Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0110</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Paula Claycomb

General Comment

I urge you to pass the proposed rule to restrict the sale of bump-fire stocks, like those used in the Las Vegas massacre. Please do so. No civilian in the US needs to use bump stocks!

As of: November 29, 2018 Tracking No. 1k2-93tg-dilz Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0111</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Carolyn Liesy

General Comment

I am not in favor of loosening regulations!

As of: November 29, 2018 **Tracking No.** 1k2-93ta-ea17 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0112</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: ALBERT FOER

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93sn-8fir **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0113</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Marlene Bressler

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93sp-bwht **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0114</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: beth bennett

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93sp-83k6 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0115</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93sp-hhrz Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0116</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Alice Gelman

General Comment

Hi, my name is Alice and I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other "conversion devices" that enable semiautomatic weapons to mimic automatic fire, qualify as "machineguns" under the National Firearms Act and are generally illegal to possess.

On the night of October 1, 2017, a gunman opened fire from a hotel room on the 32nd floor of the Mandalay Bay hotel into the 22,000 person crowd at the Route 91 Harvest country music festival in Las Vegas, Nevada, killing 58 people and injuring more than 500. The gunman fired more than 1,100 rounds of ammunition in 11 minutes, using semiautomatic rifles modified with dangerous firearm accessories designed to dramatically accelerate the rate of fire, commonly known as "bump-fire stocks." These devices are intended to circumvent the restrictions on possession of fully automatic firearms in the Gun Control Act of 1968 and the National Firearms Act of 1934 by allowing an individual to modify a semiautomatic rifle in such a manner that it operates with a similar rate of fire as a fully automatic rifle. Bump stocks and similar "conversion devices" that accelerate the rate of fire of a semiautomatic firearm are extremely dangerous and pose a substantial risk to public safety.

In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that conversion devices like bump-fire stocks are included in the definition of "machinegun" under the National Firearms Act of 1934. And then Congress must act as well to ensure that manufacturers cannot continue to endanger public safety by designing devices that imitate machine guns and subvert the law. The continued presence of these dangerous devices puts all of our communities at risk and both Congress and ATF must take action quickly to address this threat.

Thank you, Alice

As of: November 29, 2018 **Tracking No.** 1k2-93sp-yc97 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0117</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Claudia Reyes

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93t4-xk7o **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0118</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Zitzman

General Comment

to: The US Department of State

re: Proposed Rule: International Traffic in Arms Regulations, US Munitions List Categories I, II, and III

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

Sincerely, Robert Zitzman

As of: November 29, 2018 Tracking No. 1k2-93t4-l1nc Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0119</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: William Castner

General Comment

Kindly accept this comment in strong opposition to this proposed Rule. Among other reasons, liberalizing the export of firearms to foreign countries may allow terrorists to have easier access to firearms without sufficient foreign safeguards in place. If the U.S. government were to allow the gun industry to experience substantial profits due to this rule change at a minimum it should secure assurances & best practices from gun manufactures to keep US citizens safer such as assurances against sale of firearms to retailers with a record or suspicion of gun trafficking.

As of: November 29, 2018 **Tracking No.** 1k2-93t6-mvv3 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0120</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

Thank you, Margaret MacDonald

As of: November 29, 2018 Tracking No. 1k2-93tf-2aos Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0121</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Benedek Nyikos

General Comment

The United States should be passing stricter gun control laws, not attempting to make it easier to distribute weapons of war abroad. Our nation should not be making the world less safe by putting dangerous weapons in civilian hands.

As of: November 29, 2018 **Tracking No.** 1k2-93t7-02d7 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0122</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Brian Pushic

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93tj-x7kh Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0123</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Bruce Olsen

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93tt-37wb **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0124</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Eric Milgram

General Comment

I am strongly opposed to this proposed rule change. The USA has the highest homicide rate among its industrialized peers, and more than 70% of those homicides are committed with legally purchased firearms that are mass marketed as a consumer product here in the USA. Furthermore, military patterned rifles, such as the civilian version of the AR-15 are essentially street legal versions of the rifles carried by our soldiers into battle. These rifles are preferred by mass killers because of their inherent characteristics that were specifically designed to make soldiers more lethal.

The State Department is much better equipped than the Commerce Department to oversee small arms exports. Transferring this important oversight function to the Commerce Department will export America's severe gun problem to other nations, with the only benefit being increased profits for America's firearms industry.

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As of: November 29, 2018 **Tracking No.** 1k2-93tv-aq4j **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0125</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Charles Rice

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93tv-u8yc **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0126</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Charles Rice

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93tx-h1wa **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0127</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93tz-i8z9 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: <u>DOS-2017-0046-0001</u>

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0128</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Dianne Celuch

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93u0-54wj **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0129</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: ALEXANDRA DRISCOLL

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93u3-ftql Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0130</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Nick Politzki

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-4htr **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0131</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Sam Todd

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-3fv1 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: <u>DOS-2017-0046-0001</u>

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0132</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kate Sherwood

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-ktcz Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0133</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Meredith West

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-riym Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0134</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Shawn Lyon

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-xwar Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0135</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Carla Tischio

General Comment

I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other "conversion devices" that enable semiautomatic weapons to mimic automatic fire, qualify as "machineguns" under the National Firearms Act and are generally illegal to possess.

On the night of October 1, 2017, a gunman opened fire from a hotel room on the 32nd floor of the Mandalay Bay hotel into the 22,000 person crowd at the Route 91 Harvest country music festival in Las Vegas, Nevada, killing 58 people and injuring more than 500. The gunman fired more than 1,100 rounds of ammunition in 11 minutes, using semiautomatic rifles modified with dangerous firearm accessories designed to dramatically accelerate the rate of fire, commonly known as "bump-fire stocks." These devices are intended to circumvent the restrictions on possession of fully automatic firearms in the Gun Control Act of 1968 and the National Firearms Act of 1934 by allowing an individual to modify a semiautomatic rifle in such a manner that it operates with a similar rate of fire as a fully automatic rifle. Bump stocks and similar "conversion devices" that accelerate the rate of fire of a semiautomatic firearm are extremely dangerous and pose a substantial risk to public safety.

In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that conversion devices like bump-fire stocks are included in the definition of "machinegun" under the National Firearms Act of 1934. And then Congress must act as wellto ensure that manufacturers cannot continue to endanger public safety by designing devices that imitate machine guns and subvert the law. The continued presence of these dangerous devices puts all of our communities at risk and both Congress and ATF must take action quickly to address this threat.

I also am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad

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by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-nlh9 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0136</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Tom Nulty

General Comment

I am writing in strong opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-tns0 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0137</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Silvers

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-lsq5 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0138</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Cheryl Martin

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-95vf **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0139</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Frances Melott

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-d6lk **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0140</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Chuck Graver

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-km5w **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0141</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Brinkerhoff

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-4sbj **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0142</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Gaya Covington

General Comment

I am writing in absolute opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

I also feel that bump stocks should be made illegal!!

As of: November 29, 2018 Tracking No. 1k2-93uf-u8wg Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0143</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Armando A. Garcia

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

Thank you for your time and consideration...much appreciated.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-j0pu **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0144</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Dawn Tripp

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-oa09 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0145</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: BrendaLee Lennick

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer. #MomsDemandAction #StudentsDemandAction #VeteransForPeace #EnoughIsEnough

As of: November 29, 2018 Tracking No. 1k2-93uf-rf1g Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0146</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Christine Morrissey

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-rjx3 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0147</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Amanda Cordano

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-vv01 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0148</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: JL Angell

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-t9pk Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0149</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Maija Schaefer

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

I am also concerned that the proposed rule will eliminate Congressional oversight for important gun export deals; transfer the cost of processing licenses from gun manufacturers to taxpayers; and, enable unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This a very serious issue, and should be subject to more safety considerations, not fewer. It should remain under the jurisdiction of the department with the most relevant knowledge and experience.

Thank you for the opportunity to comment.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-wo1m **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0150</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Peggy Kocoras

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military" -- even though US troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also eliminates Congressional oversight for important gun export deals, transfers the cost of processing licenses from gun manufacturers to taxpayers, and enables unchecked gun production in the US and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and lacks the resources to adequately enforce export controls.

Although the current administration views everything on earth as a commodity, some things should not be for sale. Those include semiautomatic weapons. Congress giving up oversight of weapon exports is an abrogation of their responsibilities.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-1ek4 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0151</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Gabrielle New

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-4x71 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0152</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Linval DePass

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-diym **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0153</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Bronstein

General Comment

I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other "conversion devices" that enable

semiautomatic weapons to mimic automatic fire, qualify as "machineguns" under the National Firearms Act and are generally

illegal to possess. In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that

conversion devices like bump-fire stocks are included in the definition of "machinegun" under the National Firearms Act of 1934.

And then Congress must act as wellto ensure that manufacturers cannot continue to endanger public safety by designing

devices that imitate machine guns and subvert the law. The continued presence of these dangerous devices puts all of our

communities at risk and both Congress and ATF must take action quickly to address this threat.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-5b6z **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0154</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Denise Berry

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-5jrt Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0155</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Reiter

General Comment

I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other "conversion devices" that enable semiautomatic weapons to mimic automatic fire, qualify as "machineguns" under the National Firearms Act and are generally illegal to possess.

On the night of October 1, 2017, a gunman opened fire from a hotel room on the 32nd floor of the Mandalay Bay hotel into the 22,000 person crowd at the Route 91 Harvest country music festival in Las Vegas, Nevada, killing 58 people and injuring more than 500. The gunman fired more than 1,100 rounds of ammunition in 11 minutes, using semiautomatic rifles modified with dangerous firearm accessories designed to dramatically accelerate the rate of fire, commonly known as "bump-fire stocks." These devices are intended to circumvent the restrictions on possession of fully automatic firearms in the Gun Control Act of 1968 and the National Firearms Act of 1934 by allowing an individual to modify a semiautomatic rifle in such a manner that it operates with a similar rate of fire as a fully automatic rifle. Bump stocks and similar "conversion devices" that accelerate the rate of fire of a semiautomatic firearm are extremely dangerous and pose a substantial risk to public safety.

In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that conversion devices like bump-fire stocks are included in the definition of "machinegun" under the National Firearms Act of 1934. And then Congress must act as wellto ensure that manufacturers cannot continue to endanger public safety by designing devices that imitate machine guns and subvert the law. The continued presence of these dangerous devices puts all of our communities at risk and both Congress and ATF must take action quickly to address this threat.

I remember hearing the machine guns were outlawed so why should we allow a way around this law?

Thank you.

As of: November 29, 2018 Tracking No. 1k2-93uf-9dzn Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0156</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Bronstein

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of

Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that

U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in

armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates

Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to

taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of

firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency

with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which

lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism,

and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93uf-3gv3 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0157</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-wkjo **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0158</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-iq5r **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0159</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Corey E. Olsen

General Comment

I oppose moving export license oversight for firearms from the USA Department of State to the USA Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that USA government troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the USA and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-e8jn **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0160</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Richardson

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-tjow Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0161</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret A Go

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-x2se **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0162</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: James McMurtrey

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-2v77 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0163</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Lewandowski

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ug-6itx Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0164</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Marian Heidel

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-ht6o **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0165</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Angelo Ioffreda

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military" and just another export product, which they most definitely are not. U.S. troops routinely use their weapons in semiautomatic mode. Semiautomatic weapons are used by state and non-state groups in armed conflicts, by drug traffickers and criminal organizations, and the civilian possession of such weapons is prohibited in many countries. The sale of semiautomatic weapons is not a simple commercial transaction.

This misguided proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. The proposed rule also eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-6u1n **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0166</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Dana Tomasello

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-knca **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0167</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Gary Collins

General Comment

The national interest of the U.S. is not well served by moving export license oversight for firearms from the Department of State to the Department of Commerce because the wider and less restricted distribution of essentially military weaponry is inimical to the promulgation of international peace and civilian safety, or suppression of misuse of firearms by state and individual actors. The proposed rule change treats semiautomatic assault rifles as "non-military" despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, such weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-29u0 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0168</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Philip Shook

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-8bce **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0169</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Tim Fleischer

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-mnfn **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0170</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jenna Riggs

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military."

This is clearly what gun manufacturers want to increase sales. Nothing more. Moving the license oversight would be rewarding big donors including the NRA at the cost of human life. Please have a conscience, think beyond profit, and do not reduce oversight of firearms in this way.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-sy9v **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0171</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Greg Collins

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ug-fi4o Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0172</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Grady Warren

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ug-vg0h Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0173</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Erik McWilliams

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-qgug **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0174</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing to STRONGLY oppose moving export license oversight for firearms from the Department of State to the Department of Commerce.

Guns sold for profit contribute to violence around the world as well as in our own country. The US government should be making it MORE difficult to manufacture and export weapons. EVEN if sold to so-called 'friends' of the administration, many end up in the hands of those who use them against American citizens and other innocent people.

Under the proposed rule change semiautomatic assault rifles are treated as non-military. This, despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, despite the fact these weapons are used by state and non-state groups in armed conflicts, and despite the fact the civilian possession of such weapons is prohibited in many countries.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is not and WILL NEVER BE acceptable as the end result of a business model.

Firearms, guns ammunition and related article MUST be subject to more controls, NOT fewer.

As of: November 29, 2018 Tracking No. 1k2-93ug-8hin Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0175</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kevin Conway

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-rf1q **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0176</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Porter

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-c9dx **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0177</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Weiner

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ug-cxfd Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0178</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Marlene Stalter

General Comment

The proposal weakens controls over semiautomatic assault weapons, .50 sniper rifles, high-capacity ammunition magazines and it may deregulate 3D printing of guns. It could also weaken controls on gun imports.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-lc46 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0179</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Ayres

General Comment

To: Secretary of State Mike Pompeo Secretary of Commerce Wilbur Ross

We urge you to reverse the proposed regulations that would make it easier to export semi-automatic weapons and ammunition,

eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

We have seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack

hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence

should be made stronger, not weaker.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-t2yd **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0180</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: steve shap

Organization: Road Scholars International

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-u8z4 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0181</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: James Talbot

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce and any move that reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Please don't.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-lis7 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0182</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Todd Hartman

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-qhql **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0183</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Randy Harrison

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-319c **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0184</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-g9x8 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0185</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Gregory

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-11c8 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0186</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Natalie Sivak

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uh-07ay **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0187</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: James A Clark Jr.

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uh-f1ez Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: <u>DOS-2017-0046-0001</u>

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0188</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Matthew Nugent

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uh-tbv1 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0189</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Belknap

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uh-lday Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0190</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Colleen Wilkinson

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uh-qu6e Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0191</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Richard Thorne

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uh-lya5 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0192</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Fred Granlund

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uh-cha1 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0193</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Michele Biggane

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uh-qbdr Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0194</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Gary Sackett

General Comment

I am writing to oppose the proposal to move the oversight of the firearms export license from the State Department to the Commerce Department. Semiautomatic assault rifles are simply not non-military weapons and their export should remain under the oversight of the State Department. Further, the elimination of Congressional oversight enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

This proposal has been designed by the NRA and the gun manufacturers as a blatant attempt to profit by spreading lethal weapons to a world that needs to reduce the weapons of of violence, not increase them.

As of: November 29, 2018 **Tracking No.** 1k2-93uh-z1wb **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0195</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: William Schultz

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uh-auxf **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0196</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Bristow

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uh-1972 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0197</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Bristow

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uh-8mz8 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0198</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Michelle Skinner

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of

Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that

U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in

armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates

Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to

taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of

firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency

with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and

which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism,

and human rights violations. They should be subject to more controls, not fewer.

Thank you,

As of: November 29, 2018 Tracking No. 1k2-93uh-qa13 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0199</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Norman Traum

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

As of: November 29, 2018 **Tracking No.** 1k2-93uh-54dv **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0200</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jean Hartnett

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uh-gmkr Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0201</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Alexander Honigsblum

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ui-v9jx Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: <u>DOS-2017-0046-0001</u>

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0202</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other conversion devices that enable semiautomatic weapons to mimic automatic fire, qualify as machineguns under the National Firearms Act and are generally illegal to possess.

On the night of October 1, 2017, a gunman opened fire from a hotel room on the 32nd floor of the Mandalay Bay hotel into the 22,000 person crowd at the Route 91 Harvest country music festival in Las Vegas, Nevada, killing 58 people and injuring more than 500. The gunman fired more than 1,100 rounds of ammunition in 11 minutes, using semiautomatic rifles modified with dangerous firearm accessories designed to dramatically accelerate the rate of fire, commonly known as bump-fire stocks. These devices are intended to circumvent the restrictions on possession of fully automatic firearms in the Gun Control Act of 1968 and the National Firearms Act of 1934 by allowing an individual to modify a semiautomatic rifle in such a manner that it operates with a similar rate of fire as a fully automatic rifle. Bump stocks and similar conversion devices that accelerate the rate of fire of a semiautomatic firearm are extremely dangerous and pose a substantial risk to public safety.

In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that conversion devices like bump-fire stocks are included in the definition of machinegun under the National Firearms Act of 1934. And then Congress must act as wellto ensure that manufacturers cannot continue to endanger public safety by designing devices that imitate machine guns and subvert the law. The continued presence of these dangerous devices puts all of our communities at risk and both Congress and ATF must take action quickly to address this threat.

I'm not sure why we even have to petition for this common sense measure. PLEASE DO THE RIGHT THING!

As of: November 29, 2018 **Tracking No.** 1k2-93ui-s9j0 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0203</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Erica Kaplan

General Comment

I strongly oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ui-k8js **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0204</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Molly Beard

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ui-vhwj Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0205</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Iltis Organization: N/A

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ui-gqgk Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0206</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kerry Bonner

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ui-f20j **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0207</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Osada

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ui-h1k3 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0208</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: John Raby

General Comment

The last thing we need to do is militarize the Commerce Department as a means of promoting the global arms trade. The world is already awash in weapons, and selling more will only increase the odds that some will never the black market, where terrorists will buy them. This decision will haunt us.

As of: November 29, 2018 **Tracking No.** 1k2-93ui-ikjd **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0209</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Elaine Donovan

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ui-wao7 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0210</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: John Raby

General Comment

The last thing we need to do is militarize the Commerce Department by putting arms sales there. Already, there are too many military-grade weapons in the world, with the accompanying danger that they will flow into the black market, where terrorists will find them. This is an enormously destabilizing idea that will come back to haunt us.

As of: November 29, 2018 Tracking No. 1k2-93uj-uy3e Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0211</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Donohue

General Comment

I am opposed to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uj-gruc Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0212</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Ameesh Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uj-g8u2 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0213</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Carole Plourde

General Comment

I oppose moving oversight for overseas arms and munitions sales from the Department of State to the Department of Commerce. If anything we should be selling less weaponry overseas because it will eventually come back to hurt one of our soldiers overseas or wind up in the hands of terrorists.

No more weapons sales to create more havoc and misery in countries across the globe.

Do not give the Department of Commerce the oversight mandate on weapons and munitions. Their mission is to push American goods overseas and not foreign policy.

As of: November 29, 2018 Tracking No. 1k2-93uj-2dka Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0214</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Christian Biondi

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uj-7h9w **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0215</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jonathan Griswold

General Comment

I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other conversion devices that enable semiautomatic weapons to mimic automatic fire, qualify as machineguns under the National Firearms Act and are generally illegal to possess.

On the night of October 1, 2017, a gunman opened fire from a hotel room on the 32nd floor of the Mandalay Bay hotel into the 22,000 person crowd at the Route 91 Harvest country music festival in Las Vegas, Nevada, killing 58 people and injuring more than 500. The gunman fired more than 1,100 rounds of ammunition in 11 minutes, using semiautomatic rifles modified with dangerous firearm accessories designed to dramatically accelerate the rate of fire, commonly known as bump-fire stocks. These devices are intended to circumvent the restrictions on possession of fully automatic firearms in the Gun Control Act of 1968 and the National Firearms Act of 1934 by allowing an individual to modify a semiautomatic rifle in such a manner that it operates with a similar rate of fire as a fully automatic rifle. Bump stocks and similar conversion devices that accelerate the rate of fire of a semiautomatic firearm are extremely dangerous and pose a substantial risk to public safety.

In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that conversion devices like bump-fire stocks are included in the definition of machinegun under the National Firearms Act of 1934. And then Congress must act as wellto ensure that manufacturers cannot continue to endanger public safety by designing devices that imitate machine guns and subvert the law. The continued presence of these dangerous devices puts all of our communities at risk and both Congress and ATF must take action quickly to address this threat.

As of: November 29, 2018 Tracking No. 1k2-93uj-nbqd Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0216</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Victor Escobar

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uk-r44x **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0217</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Dan Wicht

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uk-zhyr Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0218</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kayla Stephens

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uk-h8s3 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0219</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Diane Black

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uk-mtyw Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0220</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Diane Black

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uk-tgke Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0221</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Alissa Sollitto

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of

Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact

that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state

groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing

licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by

removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and

transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an

agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence,

terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93uk-gfmp Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0222</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Maureen Shea

General Comment

I respectfully ask that changes not be made in the present regulations regarding exporting of semiautomatic weapons and ammunition abroad. With all the illegal arms now circulating in the world, the U.S. should be trying to reduce not add new firearms.

As of: November 29, 2018 Tracking No. 1k2-93ul-nxfm Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0223</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ul-hwwp Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0224</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: MARGARET M HODSOLL

General Comment

I am against transferring International Traffic in Arms Regulations from the State Dept. to the Commerce Dept., nor to I want to see our gun culture spread to other countries.

As of: November 29, 2018 Tracking No. 1k2-93ul-fe3b Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0225</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Hilton

General Comment

To: Secretary of State Mike Pompeo Secretary of Commerce Wilbur Ross

We urge you to reverse the proposed regulations that would make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere. We have seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence should be made stronger, not weaker.

As of: November 29, 2018 **Tracking No.** 1k2-93ul-e1li **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0226</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anne Pavlic

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ul-3kkv **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0227</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Harper

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ul-19cm Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0228</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy knipe

General Comment

Guns should be regulated by the Department of State, not the Dept of Commerce. This is not a case of commerce, but of the availability of weapons that are only meant to kill other humans at outrageous rates. I believe in more control over firearm sales and distribution. If anything we need to use our resources to curtail the purchase and sale of firearms. Some how we have become the United States of the NRA.

Bumpstocks are another egregious affront to the health and welfare of this country's citizens. BAN THE SALE OF BUMPSTOCKS at the very least.

Thank you.

As of: November 29, 2018 **Tracking No.** 1k2-93um-cybo **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: <u>DOS-2017-0046-0001</u>

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0229</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kim Duncan

General Comment

I am writing in strong opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93un-iv42 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0230</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Mark Koritz

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93un-8bxo Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0231</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Sharon Fetter

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93un-v5vb **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0232</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Cinda Johansen

General Comment

This is an emergency and all the children of the USA are in danger of being murdered. We all should and must stop the sale of assault weapons, bump stocks and high volume magazines in this country. Amendment rights are not being stepped on and the proof is the amount of guns(all types) compared to the number of people with these weapons is a small part of our population. Please think of our children.

As of: November 29, 2018 Tracking No. 1k2-93un-e4yi Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0233</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: James Cunningham Organization: Guitar Instruction

General Comment

I am writing in strong opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. This change defies sound reasoning, Aristotelian logic, and common sense to place the baseness of greed above global public safety.

Firearms are used to kill thousands of people every day around the world in acts of organized crime, street crime, political violence, terrorism, and myriad human rights violations. They should be subject to more controls, not fewer. Humanity deserves to be free from the threats posed by deranged, greedy, corrupt individuals like those responsible for proposing this absurd change.

Thank you for considering my comments.

As of: November 29, 2018 **Tracking No.** 1k2-93un-i0ea **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0234</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: JL Mulligan Organization: Retired

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uo-qqt3 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0235</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Deirdre Henderson

General Comment

THIS IS A REALLY BAD! IDEA! MOVING EXPORT LICENSE OVERSIGHT FOR FIREARMS TO THE COMMERCE DEPARTMENT IS A VERY BAD IDEA! ARE YOU ALL CRAZY??? ARE YOU SO AFRAID OF THE NRA THAT YOU DO THEIR BIDDING? DO THEY REALLY OWN YOU? HAVE YOU NO MORAL COURAGE? YOUR MOTHERS WOULD NOT BE PROUD OF YOU!!!

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uo-xn63 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0236</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jody Gibson

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uo-5kvb **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0237</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Olson

General Comment

Semiautomatic weapons are weapons for the military and should be carefully controlled. How many mass shootings are we to endure while the NRA profits from the deaths of innocent people here?

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uo-8m1y Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0238</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Donna Leslie-Dennis

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uo-185d Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0239</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jeffrey Starr

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93up-s2ve Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0240</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Celeste Hong

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93up-8mdd **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0241</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Becca Greenstein

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93up-nwwh **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0242</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Marilyn Thompson

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93up-dy1g Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0243</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: William Kingston

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93up-ezlj Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0244</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jon Berg

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uq-8u6q **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0245</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Karen Dryer

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uq-5jj6 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0246</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Paul West

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uq-4dfx **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0247</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kevin Rolfes

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ur-a7h3 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0248</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: JeVerna Haynes

General Comment

No, no, no! I'm sick of every thing in this country being about making money, instead of about the safety of our people.

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. This should not be a matter for Commerce, and must require Comgressional oversight.

As of: November 29, 2018 Tracking No. 1k2-93ur-u2tk Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0249</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Irene Vecchio

General Comment

I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other conversion devices that enable semiautomatic weapons to mimic automatic fire, qualify as machineguns under the National Firearms Act and are generally illegal to possess.

On the night of October 1, 2017, a gunman opened fire from a hotel room on the 32nd floor of the Mandalay Bay hotel into the 22,000 person crowd at the Route 91 Harvest country music festival in Las Vegas, Nevada, killing 58 people and injuring more than 500. The gunman fired more than 1,100 rounds of ammunition in 11 minutes, using semiautomatic rifles modified with dangerous firearm accessories designed to dramatically accelerate the rate of fire, commonly known as bump-fire stocks. These devices are intended to circumvent the restrictions on possession of fully automatic firearms in the Gun Control Act of 1968 and the National Firearms Act of 1934 by allowing an individual to modify a semiautomatic rifle in such a manner that it operates with a similar rate of fire as a fully automatic rifle. Bump stocks and similar conversion devices that accelerate the rate of fire of a semiautomatic firearm are extremely dangerous and pose a substantial risk to public safety.

In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that conversion devices like bump-fire stocks are included in the definition of machinegun under the National Firearms Act of 1934. And then Congress must act as wellto ensure that manufacturers cannot continue to endanger public safety by designing devices that imitate machine guns and subvert the law. The continued presence of these dangerous devices puts all of our communities at risk and both Congress and ATF must take action quickly to address this threat.

As of: November 29, 2018 Tracking No. 1k2-93us-c21a Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0250</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Balassi

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93us-1176 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0251</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Richard Bunting

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the

Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used

by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many \

countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost

of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and

exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on

gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction,

and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence,

terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93us-5b52 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0252</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Caitlyn Geist

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uu-dqzn Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0253</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Felicity Figueroa

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uw-dv70 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0254</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Sara Casey

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. Semiautomatic assault rifles are used in many conflicts around the world, most of whose victims are civilians. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uy-gmhs **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0255</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Joanne Grossi

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uz-2gfn Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0256</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Bebe McCarthy

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93v0-71um **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0257</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jill Nicholas

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93v1-i41g **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0258</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: John Wienert

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93v2-zfwb **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II,

and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0259</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Ellen Jaramillo

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

Semiautomatic assault rifles are not sporting or hunting rifles, and not meant for commercial hunting, so they should

not be governed by the Department of Commerce.

U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state

groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. Semiautomatic

assault rifles are used in military settings and therefore these types of firearms export license oversight should remain

with the Department of State.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting

on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction,

and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce

export controls. Semiautomatic assault rifles usage by private citizens results in increased crime, violence, family accidents,

and mass murder, and should be subject to more federal government controls, not fewer.

Please do not move export license oversight for firearms from the Department of State to the Department of Commerce.

As of: November 29, 2018 **Tracking No.** 1k2-93v2-ntqg **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0260</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Christina Banuelos

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93v2-592d **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0261</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Julie Maisel

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93v3-tcl1 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0262</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Florence Miller

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93v4-ynlx Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0263</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Allen Royer

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93v4-k6a4 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0264</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Heather Calvert

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93v4-1b8n Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0265</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military, despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93v4-k5qm **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0266</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Quincy Scott

General Comment

I strongly oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93v6-hn4u **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0267</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Shapiro

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93v6-2xxu Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0268</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Amanda Santmyer

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93v6-makd **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0269</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kevin Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93v6-4qgv **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0270</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Meghan Blydenburgh

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93v6-vtb7 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0271</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Hornig

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93v8-lf1g **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0272</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Hollye Dexter

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls

As of: November 29, 2018 Tracking No. 1k2-93v8-47hr Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0273</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Sheila Crane

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

Such a categorization does not reflect reality. U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Semi-automatic rifles are not appropriate for civilian populations. The Constitution does not guarantee the right to own weapons of mass destruction. The role of government is to protect its citizens and to combat the rise in mass killings of civilians that is directly tied to easy access to semi-automatic weapons.

As of: November 29, 2018 **Tracking No.** 1k2-93v8-awkn **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0274</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathleen Silloway

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93v8-i6us **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0275</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Troy Dexter

General Comment

As of: November 29, 2018 Tracking No. 1k2-93v8-iiim Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0276</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Krisana Tantivitoon

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode; these weapons are used by state and non-state groups in armed conflicts; and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

With that said, it makes absolutely no sense to change the oversight from the Department of State to the Department of Commerce. Stricter controls are needed, not laxed ones.

Thank you.

As of: November 29, 2018 Tracking No. 1k2-93v8-desd Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0277</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jenni Hailer

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93v8-8lzt **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0278</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jenna Silverman

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93v8-1vbe **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0279</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Mindy M.

General Comment

As of: November 29, 2018 Tracking No. 1k2-93v9-165z Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0280</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: John Parker

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

As of: November 29, 2018 **Tracking No.** 1k2-93v9-091a **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0281</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: rosalie Paul

General Comment

I am writing my strenuous objection to the sale of fire arms to other countries and to the possible shift of fire arms control to a commerce department. We are a nation of killers and it is ridiculous to support that ethic. It's time to get over our passion for fire arms and see that kindness is the path that can take us where we want to go. Thank you. Rosalie Pau

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As of: November 29, 2018 **Tracking No.** 1k2-93v9-wjb7 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0282</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Lucienne Canet

General Comment

I am emphatically against the move to push control of gun exports from the State Department to the Commerce Department. I believe this will increase gun exports to Latin America, which will endanger lives, increase migrant traffic to the United States, increase the number of children affected by gun violence in Central American countries, and increase the work and burden of our foster care system and social workers, as well as our local tax burden. I vow to financially and politically support efforts to vote anyone that supports this recent amendment out of congress.

As of: November 29, 2018 **Tracking No.** 1k2-93v9-3u8t **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0283</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Cathy rowan

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93v9-1ztq **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0284</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Wendy Anonymous

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-93v9-zfwd **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0285</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

This is a license to flood this country with even more weapons. Having Commerce regulate this is more pandering to the NRA. Haven't enough children been killed?

As of: November 29, 2018 Tracking No. 1k2-93v9-phur Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0286</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Julie Small

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93v9-tai5 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0287</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: ELLIOT PLINER

Organization: ST

General Comment

I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other conversion devices that enable semiautomatic weapons to mimic automatic fire, qualify as machineguns under the National Firearms Act and are generally illegal to possess.

On the night of October 1, 2017, a gunman opened fire from a hotel room on the 32nd floor of the Mandalay Bay hotel into the 22,000 person crowd at the Route 91 Harvest country music festival in Las Vegas, Nevada, killing 58 people and injuring more than 500. The gunman fired more than 1,100 rounds of ammunition in 11 minutes, using semiautomatic rifles modified with dangerous firearm accessories designed to dramatically accelerate the rate of fire, commonly known as bump-fire stocks. These devices are intended to circumvent the restrictions on possession of fully automatic firearms in the Gun Control Act of 1968 and the National Firearms Act of 1934 by allowing an individual to modify a semiautomatic rifle in such a manner that it operates with a similar rate of fire as a fully automatic rifle. Bump stocks and similar conversion devices that accelerate the rate of fire of a semiautomatic firearm are extremely dangerous and pose a substantial risk to public safety.

In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that conversion devices like bump-fire stocks are included in the definition of machinegun under the National Firearms Act of 1934. And then Congress must act as wellto ensure that manufacturers cannot continue to endanger public safety by designing devices that imitate machine guns and subvert the law. The continued presence of these dangerous devices puts all of our communities at risk and both Congress and ATF must take action quickly to address this threat.

As of: November 29, 2018 **Tracking No.** 1k2-93vb-8tpj **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0288</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Ramona Benson

General Comment

As of: November 29, 2018 Tracking No. 1k2-93vb-8mhe Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0289</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Mutascio

General Comment

As of: November 29, 2018 Tracking No. 1k2-93vc-2isl Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0290</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Wendy Wheatcroft

General Comment

As of: November 29, 2018 Tracking No. 1k2-93vd-xmz4 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0291</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Edward Wight

General Comment

As a pastor concerned about reducing violence in the world, I am writing to oppose moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule change treats semiautomatic assault rifles as non-military, yet such firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to rigorous controls.

As of: November 29, 2018 **Tracking No.** 1k2-93vd-w1pj **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0292</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Lorraine Demi

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

Thank you, in advance, for saving lives.

As of: November 29, 2018 **Tracking No.** 1k2-93ve-jf7r **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0293</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: William Marsh

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-93vf-ugx6 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0294</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Michelle Mitchell

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93vi-f03g **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0295</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Rebecca Ward

General Comment

As of: November 29, 2018 Tracking No. 1k2-93vi-y01u Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0296</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Michelle Hiseley

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93vi-rbqr Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0297</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: STACIE CHARLEBOIS

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93vn-t9mv Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0298</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Richard Blanke

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93vp-t511 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0299</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Baird

General Comment

I am writing in opposition to moving export license oversight for firearms from the State Department to the Department of Commerce. The State Department ensures national security including distribution of weapons worldwide. The Department of Commerce promotes trade; national security is not its mission.

The proposed rule change treats semiautomatic assault rifles as non-military which is not factual. It is a fact that U.S. troops routinely use their military rifles in semiautomatic mode. These weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

The proposed rule eliminates Congressional oversight for important gun export deals. It transfers the cost of processing licenses from gun manufacturers to taxpayers. And it enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to enforce export controls adequately.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

To promote national security, it is imperative that the export license over site for firearms remain within the State Department.

As of: November 29, 2018 Tracking No. 1k2-93vp-rg3q Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0300</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Ella Robson

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93vq-se80 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0301</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Deborah Klein

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-93vs-28vv **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0302</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jerry Boren

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93vs-9d10 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0303</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Lisa Coney

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93vu-amni Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0304</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Eryn K

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93vu-v4w9 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0305</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: RL M

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer."

As of: November 29, 2018 Tracking No. 1k2-93vv-dehv Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0306</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: CORY ASHLEY

General Comment

I STRONGLY SUPPORT THIS PROPOSED RULE CHANGE. I AM A US VETERAN AND I AM ALSO A TYPE 1 FFL. I WANTED TO APPLY FOR A TYPE 7 FFL MANUFACTURES LICENSE. I WAS UNABLE TO DO SO DUE TO THE HEAVY BURDEN OF THE ITAR FEE. THIS FEE DOES NOT AFFECT THE LARGE FIREARMS MANUFACTURES. IT ONLY AFFECTS SMALL BUSINESSES SUCH AS MINE. THERE ARE MANY SMALL FIREARM MANUFACTURES THAT OPERATE WITHOUT PAYING THE ITAR REGISTRATION FEE PUTTING THEMSELVES AT RISK BECAUSE THEY CAN NOT AFFORD IT. I AM ALSO A GUNSMITH. BETWEEN THE ATF REGULATIONS AND THE ITAR REGULATIONS EVERY TIME THAT I TOUCH A FIREARM I PUT MYSELF AT RISK OF RUNNING AFOUL OF THESE NUMEROUS REGULATIONS THAT OFTEN CONTRADICT EACH OTHER. MANY OF THOSE THAT COMMENT TO OPPOSE THIS RULE CHANGE ARE NOT IN THE FIREARMS INDUSTRY AND IN FACT ONLY OPPOSE IT BECAUSE IT DEALS WITH FIREARMS. INNOVATION COMES FROM THE SMALL BUSINESSES. THIS RULE CHANGE WILL HELP SMALL BUSINESSES FLOURISH.

As of: November 29, 2018 Tracking No. 1k2-93vw-cj10 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0307</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Sarah Stewart

General Comment

Please do not export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

We are writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

Please do not export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

As of: November 29, 2018 Tracking No. 1k2-93vx-y0u3 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0308</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: B. Laub

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer. Thank you.

As of: November 29, 2018 **Tracking No.** 1k2-93vy-9qlx **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0309</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93vz-tm5a Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0310</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Diana Brunswig-Bosso

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer."

As of: November 29, 2018 Tracking No. 1k2-93w0-rvy0 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0311</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: cheryl greene

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

All of us have the right to live free of fear, and more guns, especially military-type weapons creates more fear and danger in society.

As of: November 29, 2018 **Tracking No.** 1k2-93w1-s9fr **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0312</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Martha Spencer

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of

Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that

U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in

armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates

Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to

taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of

firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency

with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which

lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism,

and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93w2-e8mw **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0313</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathy Bradley

General Comment

I strongly oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93w5-y1q1 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0314</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Cora Kamerman

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93wb-futw **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0315</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Amanda Hauck

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93wb-kbab **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0316</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Annette Dubois

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93wd-j9fd **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0317</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kirby MacLaurin

General Comment

To: Secretary of State Mike Pompeo

Please reverse the proposed regulations that would weaken end-use controls, enable production of 3D weapons anywhere, make it easier to export semi-automatic weapons and ammunition, and eliminate Congressional oversight of these sales. America is not safer with a heavily armed third world - violence increases in these places, and our borders are flooded with refugees trying to escape the violence. We have also seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence should be made stronger, not weaker.

As of: November 29, 2018 **Tracking No.** 1k2-93we-vrzb **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0318</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jessica Tillery

General Comment

I urge you to reverse the proposed regulations that would make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere. We have seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence should be made stronger, not weaker.

As of: November 29, 2018 **Tracking No.** 1k2-93we-fvc1 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0319</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Long

General Comment

Petition Text:

To: Secretary of State Mike Pompeo

We urge you to reverse the proposed regulations that would make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere. We have seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence should be made stronger.

As of: November 29, 2018 **Tracking No.** 1k2-93wf-h9f7 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0320</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Ellen Goren

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93wf-c7pu Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0321</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am in full support of this proposed rule, the no-military weapons should be moved to the Commerce Department. the state department should only be in control of the military weapons, for the purpose of national security.

As of: November 29, 2018 Tracking No. 1k2-93wg-tl4q Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0322</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Hannah Mykel

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93wg-fnbs Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0323</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Harrelson

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93wg-zb1z **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0324</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Ruth Punt

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

Ruth Punt

As of: November 29, 2018 **Tracking No.** 1k2-93wh-uiq6 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0325</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anne Callies

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must absolutely be subject to more controls, not fewer!

As of: November 29, 2018 Tracking No. 1k2-93wh-fb8j Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0326</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jean Davis Organization: none

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. Do we want to encourage the mayhem that we see in the United States in other countries. Do not make it easier for others to have deadly weapons.

As of: November 29, 2018 Tracking No. 1k2-93wk-oqoe Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0327</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Gary Patton

General Comment

The proposed change in international sales of guns is a transparent effort to boost domestic gun sales during a down market for firearm manufacturers. Making a profit based on the spilling of blood by others is truly despicable.

As of: November 29, 2018 **Tracking No.** 1k2-93wl-rajh **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0328</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Nanci Kelly

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93wm-4vsv **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0329</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Scott Teel

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93wm-15rl Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0330</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Tracy Pressnall

General Comment

"I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

As of: November 29, 2018 **Tracking No.** 1k2-93wm-knd9 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0331</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Marjorie Zlotowitz

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93wp-wmnf **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0332</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Elaine Barden

General Comment

"I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93wp-q92r Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0333</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Koury

General Comment

To whom it may concern, I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93wr-thyu Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0334</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jade Masterson

General Comment

To: Secretary of State Mike Pompeo

We urge you to reverse the proposed regulations that would make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere. We have seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence should be made stronger, not weaker.

Information Sources:

- [1] The Washington Post, The Trump administration wants to make it easier to sell U.S. guns abroad. Heres what you need to know June 4, 2018. https://www.washingtonpost.com/news/monkey-cage/wp/2018/06/04/the-trump-administration-wants-to-make-it-easier-to-sell-u-s-guns-abroad-heres-what-you-need-to-know/?utm term=.cdb39dd2a669
- [2] Salon, U.S. gun industry wants a bigger piece of the worlds arms trade, June 1, 2018. https://www.salon.com/2018/06/01/u-s-gun-industry-wants-a-bigger-piece-of-the-worlds-arms-trade/ [3] State Department public comment site: https://www.regulations.gov/document? D=DOS FRDOC 0001-4527

Commerce Department public comment site: https://www.regulations.gov/document?D=BIS-2017-0004-0001

As of: November 29, 2018 Tracking No. 1k2-93ws-ipk9 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0335</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Betty McNiel

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93wt-4ews Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0336</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Caroline Hanna

General Comment

"I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93wt-fd2k **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0337</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Diana Bergman

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93wv-z8gl **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0338</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Mrs Renee las

Organization: goodnewsloancompany7 Government Agency Type: State Government Agency: Loan

General Comment

Good Day, I am Mrs Renee currently living in USA,I am a married woman at the moment with two kids and i was stuck in a financial situation by august 2012 and i needed to refinance and pay my bills for my son medication. I tried seeking loans from various loan firms both private and corporate but never with success, and most banks declined my credit. But as God would have it, i was introduced to a Man of God a private loan lender by a friend named Mr. Roderick and i got a loan sum of \$100,000.00USD and today i am a business owner and my kids are doing well at the moment. So dear, if you must contact any firm with reference to securing a loan with low interest rate of 2% and better repayment plans and schedule, please contact Mr. Jude Shanko he doesnt know that i am doing this but i am so happy now and i decided to let people know more about him, he offers all kinds of loans to both individuals and companies and also i want God to bless him more. You can contact his company through this email: goodnewsloancompany7@gmail.com

As of: November 29, 2018 Tracking No. 1k2-93x0-h5z9 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0339</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: i dubya

General Comment

Small business owners were stifled by ITAR fees; this is the ONLY reason I personally haven't expanded my businesses to include firearms manufacturing. I have no intention of dealing internationally, but I my largest tax as a firearms manufacturer is paid to an agency protecting us from international trade of arms? The tax burden must be shouldered by everyone that is protected instead of attacking the firearms industry. The removal of ITAR fee can equate to a 7500% decrease in taxes to a small business operating on a single FFL!

FFL=\$30/yr ITAR=\$2250/yr

7500% tax decrease = ITAR / FFL * 100

That is too large of a tax to be shouldered by the firearms industry alone, and the size of that tax paired with the tax burden being placed solely on the firearms industry seemed like a tax created to deter small business from continued operation and a preventative measure deterring new business from starting in this industry. I can say that the only reason I haven't obtained my FFL is because of this unjust tax burden; I refuse to start a firearms manufacture business because of ITAR fees.

As of: November 29, 2018 Tracking No. 1k2-93x1-f0mz Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I,

II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0340</u> Comment on <u>DOS-2017-0046-0001</u>

Submitter Information

Name: j dubya

General Comment

The Firearms Commerce in the United States Annual Statistical Update 2017 by The United States Department of Justice BATFE shows 1,360,023 suppressors owned by American civilians.

I own and use suppressors. I applaud anyone shooting next to me willing to navigate the red tape of suppressor ownership. A close family member that has lost his hearing from hunting since he was 5 could still be living without hearing aids if more of us sportsman had a muffler on the front of our barrels. NO 33 YEAR OLD SHOULD HAVE HEARING AIDS!

Suppressors are common and simple accessories to American gun owners and the fact that suppressor are NOT planned on being removed from the ITAR list is UNACCEPTABLE! No small business should be forced to pay ITAR fees just because that business manufactured one suppressor in a year.

Maybe businesses that want to sell their suppressors internationally should pay ITAR fees.

Maybe every income tax paying individual should pay for these ITAR fees...Every income tax paying individual is being protected from the International Traffic in Arms Regulations (ITAR). Americans are not required to pay extra for police protection just because that American requires more protection from the Police. Firefighters do not collect more taxes from an individual whose house burns down versus someone that needs their cat taken out of a tree. The firearms industry should not be required to pay for the protection of every American citizen; that protection is a burden that every American Citizen should be required to pay.

The bottom line is this:

-IF ITAR taxes are being used to keep citizens safe then we need to have citizens foot the bill.

BUT

-IF ITAR taxes are in place to deter small business owners operating withing the firearms industry then ITAR needs to be removed from the laws of this country.

As of: November 29, 2018 Tracking No. 1k2-93x2-jkvn Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0341</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Laura Sokoloski

General Comment

I oppose the relaxing of rules regarding the export of assault rifles and other arms by U.S. firearm manufacturers, and urge the Commerce and State Departments to oppose these as well. Exporting more arms is not going to help make the world a more peaceful place, especially assault rifles, instead an increased prevalence of firearms simply increases hostilities and leads to more gun related violence and deaths. Exporting an additional 70,000 arms annually will only increase the death toll from 1,000 gun related deaths worldwide every year. This is not something I can support in good conscience.

As of: November 29, 2018 Tracking No. 1k2-93x4-8dbi Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0342</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Ronald Miller

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93x5-va8x Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0343</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Joann Hilton

General Comment

"I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93x6-mixc Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0344</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Sharon Hurn

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93x7-xsz8 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0345</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Laurie Martinelli

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93x8-1e24 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0346</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Harlan Ekre

General Comment

As a small business only dealing with commercial small arms parts, we welcome the regulatory change. Lumping commercial small arms items into the ITAR regulations creates an onerous and unnecessary financial burden on small businesses in the U.S. who have no connection to military arms or to the export of same.

As of: November 29, 2018 Tracking No. 1k2-93x9-ilwm Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0347</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Herbert Langston

General Comment

Please stop extorting money from gun manufacturers who do not export "weapons of war".

Opponents who are against "attempts to legitimize semiautomatic assault rifles as civilian products" should bear in mind that we have had semiautomatic magazine-fed civilian rifles since 1910 (Winchester Model 10 SLR) and that these were never issued to the military.

The much-maligned AR-15 was released as a civilian-only firearm in 1964. The military didn't adopt it until two years later, by having it modified as a fully-automatic rifle (M-16) that civilians cannot own. The AR-15 is in use by NO military power in the world, and never has been.

Do not be bullied by left-wing extremists who would see this nation completely disarmed for their own political power.

Non-military products are under the scope and purview of the Commerce Department, not the State Department.

As of: November 29, 2018 Tracking No. 1k2-93x9-lzck Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0348</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Philip Kober JD, MD, PhD

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. As a physician, I categorically can state that the harm to human beings is no different between semiautomatic and fully automatic weapons. The energy transferred to the bullet is what is important, along with other characteristics such as yawing of the bullet on impact (tumbling), explosive ammunition, and other such characteristics. The only difference between and automatic weapon and a semiautomatic weapon is that the automatic continues to fire simply by holding the trigger down, whereas the trigger must be pulled for each shot for the semiautomatic. The rest of the mechanical actions involved are the same. They both have high velocity, and characteristics of the ammunition that make them deadly to many, many people over a short period of time. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. All of these provisions are DEADLY, and should not be adopted.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93xa-8n1i Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0349</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Arthur Laudenslager

General Comment

I support loosening of ITAR to the maximum extent possible.

The intent of ITAR was to keep technological superiority on the side of US forces, and out of the hands of our enemies, and that is a noble goal. However, when our own "military assistance" programs give those same items, such as night vision, select fire M-4 carbines, and ceramic armor away to extremely unreliable "allies" such as Iraq, and we see them show up shortly thereafter in enemy hands, it makes one wonder what exactly the point of imposing these ridiculous restrictions on small business gunsmiths and the like could possibly be.

As of: November 29, 2018 **Tracking No.** 1k2-93xa-m6nx **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0350</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Coop Cooper

General Comment

We urge you to reverse the proposed regulations that would make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere. We have seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence should be made stronger, not weaker.

As of: November 29, 2018 **Tracking No.** 1k2-93xa-y3b3 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0351</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Fulford

General Comment

America is the last free country in the world...take the chains off of our manufacturers.... I agree with the new proposed rule change.

As of: November 29, 2018 Tracking No. 1k2-93xa-ego5 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0352</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Matt Newburn

General Comment

The ITAR regs are useless infringement on Americans rights.

As of: November 29, 2018 Tracking No. 1k2-93xa-ffc2 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0353</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Paul Current

General Comment

I support the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This will help small businesses, improve the economy, and mitigate one of the many infringements of our 2nd amendment rights.

As of: November 29, 2018 Tracking No. 1k2-93xa-dl3v Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0354</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Carol Landale

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because, amongst other things, the proposed rule change treats semiautomatic assault rifles as non-military." Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

The proposed rule eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

The US has already alienated many of our allies. This rule change adds to the insults already made. Why are there so many immigrants trying to escape gun violence in Central America? More arms to countries like Nicaragua and Honduras will only exacerbate the problem.

As of: November 29, 2018 Tracking No. 1k2-93xa-ai6g Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0355</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: cory shamblen

General Comment

Please stop extorting money from gun manufacturers who do not export "weapons of war".

Opponents who are against "attempts to legitimize semiautomatic assault rifles as civilian products" should bear in mind that we have had semiautomatic magazine-fed civilian rifles since 1910 (Winchester Model 10 SLR) and that these were never issued to the military.

The much-maligned AR-15 was released as a civilian-only firearm in 1964. The military didn't adopt it until two years later, by having it modified as a fully-automatic rifle (M-16) that civilians cannot own. The AR-15 is in use by NO military power in the world, and never has been.

Do not be bullied by left-wing extremists who would see this nation completely disarmed for their own political power.

Non-military products are under the scope and purview of the Commerce Department, not the State Department.

As of: November 29, 2018 **Tracking No.** 1k2-93xb-4be9 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0356</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Bob Andrews

General Comment

ITAR overreach is a thing of legend, these are just the beginning of the roll backs that need to be instituted, but at least they're a start.

As of: November 29, 2018 Tracking No. 1k2-93xc-plx9 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0357</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Dana Jacobson

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to MORE controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93xd-ub2j **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0358</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

These reforms will help take the yoke off of small manufacturers! Make America Great!

As of: November 29, 2018 Tracking No. 1k2-93xe-xa6e Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0359</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Tim Tolliver

General Comment

I support this change - this change will be a positive one for small businesses, and will have no change on safety in America.

As of: November 29, 2018 Tracking No. 1k2-93xf-gdfc Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0360</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Please stop extorting money from gun manufacturers who do not export "weapons of war".

Opponents who are against "attempts to legitimize semiautomatic assault rifles as civilian products" should bear in mind that we have had semiautomatic magazine-fed civilian rifles since 1910 (Winchester Model 10 SLR) and that these were never issued to the military.

The much-maligned AR-15 was released as a civilian-only firearm in 1964. The military didn't adopt it until two years later, by having it modified as a fully-automatic rifle (M-16) that civilians cannot own. The AR-15 is in use by NO military power in the world, and never has been.

Do not be bullied by left-wing extremists who would see this nation completely disarmed for their own political power.

Non-military products are under the scope and purview of the Commerce Department, not the State Department.

As of: November 29, 2018 Tracking No. 1k2-93xp-nhlt Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0361</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Oanh Nguyen

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93xr-jrdz **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0362</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Lorraine Thompson

General Comment

DO NOT amend the International Traffic in Arms Regulations (ITAR) to revise Categories I (firearms, close assault weapons and combat shotguns), II (guns and armament) and III (ammunition and ordnance) of the U.S. Munitions List (USML) to describe more precisely the articles warranting export and temporary import control on the USML. Items removed from the USML would become subject to the Export Administration Regulations (EAR).

The only reason for this amendment is to enable big time arms dealers to make even MORE money and to "facilitate more killings of common citizens around the world in places like the DRC.

As of: November 29, 2018 **Tracking No.** 1k2-93xr-v1o1 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0363</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Tim Duncan

General Comment

ID: DOS-2017-0046-0061

Tracking Number: 1k2-93nd-lf3l

Do not demand fees from companies that do not export as they should be outside State Department's purview.

Please do not burden small business with these fees and regualtions.

These regulations as currently applied cast a broad net that results in many small companies that DO NOT export anything being forced to pay a significant sum of money to an agency that should have no oversight over domestic production of commercial firearms and firearms-related items.

From the perspective of people in the firearms and gunsmithing business, this is an unabashed power and money grab by a huge agency with unlimited resources to crush any small company that does not comply with these regulations as State Department has decided to interpret them.

Small businesses do care greatly about "fees" being imposed on them. Profit margins for many of these small shops are meager to begin with. Once it was announced that very burdensome fees were going to be imposed, many businesses closed. It was not worth the hassle and expense anymore. If the aim of these regulations is to drive small companies out of business leaving only the big fish, this is being brilliantly executed.

Please apply some logic to these regulations.

As of: November 29, 2018 Tracking No. 1k2-93xr-arwq Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0364</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jonathan Pinkston

General Comment

Please stop extorting money from gun manufacturers who do not export.

Opponents who are against "attempts to legitimize semiautomatic assault rifles as civilian products" should bear in mind that we have had semiautomatic magazine-fed civilian rifles since 1910 (Winchester Model 10 SLR) and that these were never issued to the military.

The much-maligned AR-15 was released as a civilian-only firearm in 1964. The military didn't adopt it until two years later, by having it modified as a fully-automatic rifle (M-16) that civilians cannot own. The AR-15 is in use by NO military power in the world, and never has been.

Non-military products are under the scope and purview of the Commerce Department, not the State Department.

Do not be bullied by left-wing extremists who would see this nation completely disarmed for their own political power.

ITAR cost money but provides nothing to non-export businesses. I see this as form of protection money just like the mob. Pay up or else sort of racket. How do you spell RICO? ITAR?

As of: November 29, 2018 **Tracking No.** 1k2-93xr-fis4 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0365</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Liz Anderson

General Comment

It is both dangerous and irresponsible to allow greater freedom of arms trafficking.

As of: November 29, 2018 Tracking No. 1k2-93xs-8bhw Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0366</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: A.L. Steiner

General Comment

I'm writing in FULL OPPOSITION to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

As you know, the proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to KILL 1,000 people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to MORE controls and elimination of these weapons, not fewer controls and more weapons!

As of: November 29, 2018 Tracking No. 1k2-93xt-ean1 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0367</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Bobby Wayne

General Comment

I support rule changes to eliminate the itars requirement for businesses that do not conduct international arms trade.

Itars creates an undue burden on small businesses, particularly gunsmiths who repair hunting rifles. It creates no benefit to continue to extend these requirements to business that only conduct business domesticly.

As of: November 29, 2018 **Tracking No.** 1k2-93xt-f5bq **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0368</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Sand

General Comment

I am opposed to the proposed rule change to move semiautomatic firearms and other dangerous items from the US Munitions List to the Commerce Control List where there is less assurance that these weapons are kept out of the possession of people with nefarious purpose in mind. The CCL is meant for items not easily sold on the black market. Clearly, semiautomatic weapons would be sold on the black market. Crime and human rights in countries with autocratic governments would conceivably worsen. The weapons could find their way back to the US to be used in criminal activity here. The State Department is not obligated to alert Congress to the sale of items on the CCL so there would be less oversight. Transparency in government must be maintained to keep the people of the world safe and democracy from backsliding. A serious change like this must not be dictated by any business involved with the manufacture or sale of these goods. I am thinking perhaps the gun industry has been lobbying for the change. Their interest in gun sales should never override the US responsibility to support safety and human rights everywhere. Thank you for your attention.

As of: November 29, 2018 **Tracking No.** 1k2-93xu-ai26 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0369</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Denise Lytle

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93xv-hp0o Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0370</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Cecilia Burns

General Comment

Semi-automatic firearms should stay on the State Department's US Munitions List and NOT be transferred to the Commerce Control List. I am opposed to reclassifying semi-automatic weapons as commercial items. These proposed changes would impact public safety and public health for decades to come.

As of: November 29, 2018 Tracking No. 1k2-93xw-2iih Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0371</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Ken and Geraldine Grunow

General Comment

Dear Regulators,

We have just learned about the proposed re-designation of small arms: automatic and semi-automatic weapons of the AK-47 variety: from the USML to the Commerce Control List. This would reduce the security and monitoring of such transfers.

Having observed the devastating power of these arms in mass killings in our own country, we are deeply concerned about the flow of such weapons into the world market, where they not only may be used in human rights violations abroad but also may find their way back to the US.

The role of our government agencies should be to reduce the level of violence across the world, not to enhance it.

Please do not make these changes! Keep any distribution of such weaponry under close supervision (if we had our way, no one would be getting such weapons).

Thank you for your attention.

Ken and Geraldine Grunow, Dearborn, MI

As of: November 29, 2018 **Tracking No.** 1k2-93xw-x7oh **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0372</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Ira Sharp

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93xx-eogg **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0373</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Hensley Garlington

General Comment

I fully support these changes to ease exports.

As of: November 29, 2018 Tracking No. 1k2-93xy-q82y Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0374</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Rachel McHale

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93xy-kkpv **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0375</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Claire Perricelli

General Comment

We don't need more automatic and semi automatic weapons circulating in our country.

As of: November 29, 2018 Tracking No. 1k2-93xz-kedi Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0376</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Sheila Sharpe

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93xz-2px3 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0377</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kristin MacLeod

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93y0-anhp Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0378</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Craig clark

General Comment

Semi-automatic firearms should stay on the State Department's US Munitions List. With video-games training our children to kill without thought, the abundance of weaponry and ammunition is insane. Children can find weaponry and ammunition unguarded and accessible whereas gun and ammo safes should be mandatory.

Automatic weaponry has been used in many school killings and genocide throughout the world so mush so that the thought of reclassifying semi-automatic weapons as commercial items is extremely ludicrous.

As of: November 29, 2018 Tracking No. 1k2-93y1-u8sq Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0379</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Ivan Weinstein

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote exports and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93y1-pm1y Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0380</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Steven Wetstein

General Comment

I oppose moving semiautomatic weapons from the USML list to the CCL list. Doing so would only increase world violence.

As of: November 29, 2018 **Tracking No.** 1k2-93y2-hapn **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0381</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Cynthia Edgerly

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93yd-4saq Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0382</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kirk Rhoads

General Comment

Semi-automatic firearms should stay on the State Department's US Munitions List.

As of: November 29, 2018 **Tracking No.** 1k2-93ye-m74j **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0383</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Fred Button

General Comment

Itars restrictions and fees are burdensom. In cases where a company does not manufacture or sell military equipment or conduct international trade, these burdens are without benefit.

I support the transfer of itars to the commerce Dept and the reduction of the requirement for itars in cases such as those listed above.

As of: November 29, 2018 Tracking No. 1k2-93yj-znkh Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

1, 11, and 111

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0384</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Cynthia Edney

General Comment

I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other "conversion devices" that enable semiautomatic weapons to mimic automatic fire, qualify as "machineguns" under the National Firearms Act and are generally illegal to possess.

On the night of October 1, 2017, a gunman opened fire from a hotel room on the 32nd floor of the Mandalay Bay hotel into the 22,000 person crowd at the Route 91 Harvest country music festival in Las Vegas, Nevada, killing 58 people and injuring more than 500. The gunman fired more than 1,100 rounds of ammunition in 11 minutes, using semiautomatic rifles modified with dangerous firearm accessories designed to dramatically accelerate the rate of fire, commonly known as "bump-fire stocks". These devices are intended to circumvent the restrictions on possession of fully automatic firearms in the Gun Control Act of 1968 and the National Firearms Act of 1934 by allowing an individual to modify a semiautomatic rifle in such a manner that it operates with a similar rate of fire as a fully automatic rifle. These "conversion devices" that accelerate the rate of fire of a semiautomatic firearm pose a substantial risk to public safety.

In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that conversion devices like bump-fire stocks are included in the definition of "machinegun" under the National Firearms Act of 1934. And then Congress must act as well to ensure that manufacturers cannot continue to endanger public safety by designing devices that imitate machine guns and subvert the law. For the safety of our communities, both Congress and ATF must take action quickly to address this threat.

As of: November 29, 2018 Tracking No. 1k2-93yj-5kre Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0385</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Eric Liles

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93ym-bgzc Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0386</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Erick Williams

General Comment

See attached file(s)

Attachments

ITAR amendment comments June 27, 2018

William A. Root 2700 Burcham Drive, Apt 234 East Lansing, MI 48823 billroot23@gmail.com

Erick Williams, JD 1209 Old Hickory East Lansing, MI 48823 willnielsen@sysmatrix.net

June 27, 2018

US Department of State
Bureau of Political Military Affairs
Directorate of Defense Trade Control
DDTCPublicComments@state.gov
http://www.regulations.gov

Re: ITAR Amendment—Categories I, II, and III DDTC

Greetings:

These are comments on the Department of State's proposed rule to amend the International Traffic in Arms Regulations (ITAR) and categories I, II and III of the US Munitions List (USML). 83 Federal Register 24166, May 24, 2018.

Background

The ITAR amendment should be revised to better support the rule of law.

The Arms Control and Disarmament Act, at 22 USC 2551, declares:

An ultimate goal of the United States is a world ... in which the use of force has been subordinated to the rule of law ...

No profession is more closely identified with the rule of law than the police profession. Peace officers are the street-level keepers of the law, all over the world. If the United States is committed to "subordinating the use of force to the

rule of law", it must protect the environment in which peace officers do their work. When armed gangs can overpower local peace officers, local communities become war zones where the rule of law is subordinated to the use of force.

We fail to protect peace officers when we put highly destructive weapons in the hands of civilians who target the police.

The ITAR amendment, as proposed, will make it easier to put firearms in the hands of civilians and armed gangs that are superior to those carried by local peace officers, thus threatening the rule of law in local communities. In several parts of the world, armed gangs are impairing the rule of law, and their activities cross borders. Notorious examples of the adverse effects of firearm proliferation can be seen in Africa and the Middle East, as well as closer to home – in Central America and Mexico, with adverse effects along the southern border of the United States.

See: Alec MacGillis, "America's Wild-West Gun Laws Are Helping Fuel The Border Crisis: The Unwanted Traffic Between The US And Central America Goes Both Ways" (New Republic, July 21, 2014), https://newrepublic.com/article/118759/nra-and-gun-trafficking-are-adding-fuel-border-migrant-crisis

Robert Muggah and Steven Dudley, Op-Ed: "The Latin American Gun Leak", (Los Angeles Times, January 16, 2015), http://www.latimes.com/opinion/op-ed/la-oe-muggah-arming-latin-america-20150118-story.html

"Attacks against Peacekeepers" (United Nations OHCHR, May 2017), https://www.ohchr.org/Documents/Countries/CF/Mapping2003-2015/Factsheet7-EN.pdf

"Attacks against civilians and MINUSCA peacekeepers in the town of Bangassou in the Central African Republic" (Office of the Spokesperson for the UN Secretary-General, May 14, 2017) https://www.un.org/sg/en/content/statement/2017-05-14/statement-attributable-spokesman-secretary-general-attacks-against

Alex Yablon, "American Guns Drive the Migrant Crisis that Trump Wants to Fix with a Wall" (Trace, May 25, 2017) https://www.thetrace.org/2017/05/gun-trafficking-central-america-immigrant-crisis-trump-wall/

Jonathan Blitzer, "The Link Between America's Lax Gun Laws and the Violence That Fuels Immigration" (New Yorker, March 22, 2018),

https://www.newyorker.com/news/news-desk/the-link-between-americas-lax-gun-laws-and-the-violence-that-fuels-immigration

See: "Clear and Present Danger: National Security Experts Warn about the Danger of Unrestricted Sales of 50 Caliber Anti-Armor Sniper Rifles to Civilians" (Violence Policy Center, July 2005), http://www.vpc.org/studies/50danger.pdf

ITAR should focus more attention on the security needs of local communities where firearms are proposed to be exported.

The Department of State is liberalizing its rules on firearm exports partly because the Department of Defense has determined that so-called semi-automatic firearms are of diminished importance in military conflicts. DoD's determination may well be valid, but it misses the point. Military analysts worry, as they should, about the impact of weapons on the battlefield. But evaluating the impact of firearms on the battlefield gives short shrift to the security needs of civilian communities. To support the rule of law we must consider the impact of firearms on public safety, peace officer safety, crime control, and the prevention and management of civil disturbances. Firearms that "no longer warrant control" by the military may nonetheless overwhelm police patrols and threaten the rule of law in local communities.

ITAR should not treat the US firearms market as the global standard. The United States is proposing to liberalize its rules on firearm exports grounded partly on the false premise that firearms are "widely available in retail outlets ... abroad." That is not true. The US firearms market is unique. Mexico, for example, has more restrictive gun laws than the United States.

See: Topher McDougal, David A. Shirk, Robert Muggah and John H. Patterson, "The Way of the Gun: Estimating Firearms Traffic Across the US-Mexico Border" (Trans-Border Institute, University of San Diego, March 2013), https://igarape.org/br/wp-content/uploads/2013/03/Paper The Way of the Gun web2.pdf

Zachary Elkins, Tom Ginsburg & James Melton, "US Gun Rights Truly Are American Exceptionalism", (Bloomberg, March 7, 2013), https://www.bloomberg.com/view/articles/2013-03-07/u-s-gun-rights-truly-are-american-exceptionalism

The United States risks alienating friendly foreign nations by projecting its permissive domestic gun laws abroad.

The Department of State has access to information about what kinds of weapons are typically carried by patrol officers in foreign countries. The Department has the wherewithal to judge whether a firearm proposed for export is likely to outmatch the firearms carried by local police forces. The Department should use that knowledge -- and make that judgment -- as it evaluates firearm export applications.

In evaluating the suitability of firearm exports, the ITAR should set a maximum limit on the destructive potential of firearms exportable to civilians. Firearms with muzzle energies higher than, for example, 5,000 Joules should be barred from export to non-government end-users. (In ballistics, muzzle energy, commonly expressed in Joules or foot-pounds, is a measure of the destructive potential of a firearm or cartridge.) The risk that a firearm poses to life and property – and the danger it poses to police officers – depends rather more on the firearm's destructive potential and rather less on whether the firearm is automatic, semi-automatic, non-automatic, not-fully-automatic, or over- or under .50-caliber.

Highly destructive weapons should be off-limits for export to civilians. Whatever short-term economic benefit those exports may generate is outweighed by the risk those weapons pose to the safety of peace officers and the rule of law. No firearm with a muzzle energy of 5,000 J belongs on a street anywhere in the world.

Policy Recommendations

The following changes should be incorporated in ITAR:

- 1. Applications for firearm export licenses should be denied when the firearm proposed for export is of such destructive potential as to threaten the safety of local law enforcement officers.
- 2. Prohibit exports of firearms with muzzle energies less than 5,000 J, to civilian end-users, world-wide, if the firearm is likely to outmatch weapons carried by local peace officers or otherwise impair the efforts of peace officers to control crime and civil disturbance.
- 3. Prohibit export of firearms with muzzle energies above 5,000 J to civilian endusers world-wide.

Technical Language

The recommendations above may be translated into the ITAR framework using the technical language below.

(1)

22 CFR 120.4

Add a Note 3 to 22 CFR 120.4 as follows:

FOR FIREARMS AND AMMUNITION, PERFORMANCE CAPABILITY INCLUDES DESTRUCTIVE POTENTIAL, AS MEASURED BY MUZZLE ENERGY, COMMONLY EXPRESSED IN JOULES OR FOOT-POUNDS.

(2)

22 CFR 121.1, Category I

Add Note 3 to Category I of 22 CFR 121.1 as follows:

(a) SUBJECT TO (b) AND (c), APPLICATIONS FOR ITEMS CONTROLLED UNDER THIS CATEGORY WILL GENERALLY BE CONSIDERED FAVORABLY ON A CASEBY-CASE BASIS UNLESS THERE IS CIVIL DISORDER IN THE COUNTRY OR REGION OR UNLESS THERE IS EVIDENCE THAT THE GOVERNMENT OF THE IMPORTING COUNTRY MAY HAVE VIOLATED INTERNATIONALLY RECOGNIZED HUMAN RIGHTS. THE JUDICIOUS USE OF EXPORT CONTROLS IS INTENDED TO DETER THE DEVELOPMENT OF A CONSISTENT PATTERN OF HUMAN RIGHTS ABUSES, DISTANCE THE UNITED STATES FROM

SUCH ABUSES AND AVOID CONTRIBUTING TO CIVIL DISORDER IN A COUNTRY OR REGION.

- (b) A LICENSE APPLICATION FOR A FIREARM OR AMMUNITION WITH MUZZLE ENERGY OF 5,000 JOULES (3,688 FOOT-POUNDS) OR MORE, OR ASSOCIATED EQUIPMENT, SHALL BE DENIED TO NON-GOVERNMENT END-USERS.
- (c) A FIREARM, AND AMMUNITION, WITH MUZZLE ENERGY LESS THAN 5,000 JOULES (3,688 FOOT-POUNDS), AND ASSOCIATED EQUIPMENT, MAY BE APPROVED TO NON-GOVERNMENT END-USERS UNLESS THE FIREARM WOULD TEND TO OUTMATCH WEAPONS NORMALLY CARRIED BY LAW ENFORCEMENT OFFICERS ON ROUTINE PATROL IN THE AREA WHERE THE WEAPON WOULD BE AUTHORIZED FOR USE OR OTHERWISE IMPAIR THE EFFORTS OF LAW ENFORCEMENT OFFICERS IN THE AREA TO CONTROL CRIME AND CIVIL DISTURBANCE.

(3)

22 CFR 121.1, category II

Add a Note 3 to category II of 22 CFR 121.1, paragraph (a), as follows:

(a) SUBJECT TO (b) AND (c), APPLICATIONS FOR ITEMS CONTROLLED UNDER THIS CATEGORY WILL GENERALLY BE CONSIDERED FAVORABLY ON A CASE-BY-CASE BASIS UNLESS THERE IS CIVIL DISORDER IN THE COUNTRY OR REGION OR UNLESS THERE IS EVIDENCE THAT THE GOVERNMENT OF THE IMPORTING COUNTRY MAY HAVE VIOLATED INTERNATIONALLY

RECOGNIZED HUMAN RIGHTS. THE JUDICIOUS USE OF EXPORT CONTROLS IS INTENDED TO DETER THE DEVELOPMENT OF A CONSISTENT PATTERN OF HUMAN RIGHTS ABUSES, DISTANCE THE UNITED STATES FROM SUCH ABUSES AND AVOID CONTRIBUTING TO CIVIL DISORDER IN A COUNTRY OR REGION.

- (b) A LICENSE APPLICATION FOR A FIREARM OR AMMUNITION WITH MUZZLE ENERGY OF 5,000 JOULES (3,688 FOOT-POUNDS) OR MORE, OR ASSOCIATED EQUIPMENT, SHALL BE DENIED TO NON-GOVERNMENT END-USERS.
- (c) A FIREARM, AND AMMUNITION, WITH MUZZLE ENERGY LESS THAN 5,000 JOULES (3,688 FOOT-POUNDS), AND ASSOCIATED EQUIPMENT, MAY BE APPROVED TO NON-GOVERNMENT END-USERS UNLESS THE FIREARM WOULD TEND TO OUTMATCH WEAPONS NORMALLY CARRIED BY LAW ENFORCEMENT OFFICERS ON ROUTINE PATROL IN THE AREA WHERE THE WEAPON WOULD BE AUTHORIZED FOR USE OR OTHERWISE IMPAIR THE EFFORTS OF LAW ENFORCEMENT OFFICERS IN THE AREA TO CONTROL CRIME AND CIVIL DISTURBANCE.

(4)

22 CFR 121.1, category III

Add a new paragraph 4 to notes to category III of 22 CFR 121.1, as follows:

(a) SUBJECT TO (b) AND (c), APPLICATIONS FOR ITEMS CONTROLLED UNDER THIS CATEGORY WILL

GENERALLY BE CONSIDERED FAVORABLY ON A CASE-BY-CASE BASIS UNLESS THERE IS CIVIL DISORDER IN THE COUNTRY OR REGION OR UNLESS THERE IS EVIDENCE THAT THE GOVERNMENT OF THE IMPORTING COUNTRY MAY HAVE VIOLATED INTERNATIONALLY RECOGNIZED HUMAN RIGHTS. THE JUDICIOUS USE OF EXPORT CONTROLS IS INTENDED TO DETER THE DEVELOPMENT OF A CONSISTENT PATTERN OF HUMAN RIGHTS ABUSES, DISTANCE THE UNITED STATES FROM SUCH ABUSES AND AVOID CONTRIBUTING TO CIVIL DISORDER IN A COUNTRY OR REGION.

- (b) A LICENSE APPLICATION FOR AMMUNITION WITH MUZZLE ENERGY OF 5,000 JOULES (3,688 FOOT-POUNDS) OR MORE, OR ASSOCIATED EQUIPMENT, SHALL BE DENIED TO NON-GOVERNMENT END-USERS.
- (c) AMMUNITION, WITH MUZZLE ENERGY LESS THAN 5,000 JOULES (3,688 FOOT-POUNDS) MAY BE APPROVED TO NON-GOVERNMENT END-USERS UNLESS THE FIREARM WOULD TEND TO OUTMATCH WEAPONS NORMALLY CARRIED BY LAW ENFORCEMENT OFFICERS ON ROUTINE PATROL IN THE AREA WHERE THE WEAPON WOULD BE AUTHORIZED FOR USE OR OTHERWISE IMPAIR THE EFFORTS OF LAW ENFORCEMENT OFFICERS IN THE AREA TO CONTROL CRIME AND CIVIL DISTURBANCE.

(5)

15 CFR 124.14 (c) (9)

Amend 15 CFR 124.14 (c) (9) as follows:

- (a) Unless the articles covered by the agreement are in fact intended to be distributed to private persons or entities (e.g., cryptographic devices and software for financial and business applications), the following clause must be included in all warehousing and distribution agreements: "Sales or other transfers of the licensed article shall be limited to governments of the countries in the distribution territory and to private entities seeking to procure the licensed article pursuant to a contract with a government within the distribution territory, unless the prior written approval of the U.S. Department of State is obtained.
- (b) SUBJECT TO (c) AND (d), APPLICATIONS FOR ITEMS CONTROLLED UNDER THIS CATEGORY WILL GENERALLY BE CONSIDERED FAVORABLY ON A CASEBY-CASE BASIS UNLESS THERE IS CIVIL DISORDER IN THE COUNTRY OR REGION OR UNLESS THERE IS EVIDENCE THAT THE GOVERNMENT OF THE IMPORTING COUNTRY MAY HAVE VIOLATED INTERNATIONALLY RECOGNIZED HUMAN RIGHTS. THE JUDICIOUS USE OF EXPORT CONTROLS IS INTENDED TO DETER THE DEVELOPMENT OF A CONSISTENT PATTERN OF HUMAN RIGHTS ABUSES, DISTANCE THE UNITED STATES FROM SUCH ABUSES AND AVOID CONTRIBUTING TO CIVIL DISORDER IN A COUNTRY OR REGION.
- (c) A LICENSE APPLICATION FOR A FIREARM OR AMMUNITION WITH MUZZLE ENERGY OF 5,000 JOULES (3,688 FOOT-POUNDS) OR MORE, OR ASSOCIATED

EQUIPMENT, SHALL BE DENIED TO NON-GOVERNMENT END-USERS.

(d) A FIREARM, AND AMMUNITION, WITH MUZZLE ENERGY LESS THAN 5,000 JOULES (3,688 FOOT-POUNDS), AND ASSOCIATED EQUIPMENT, MAY BE APPROVED TO NON-GOVERNMENT END-USERS UNLESS THE FIREARM WOULD TEND TO OUTMATCH WEAPONS NORMALLY CARRIED BY LAW ENFORCEMENT OFFICERS ON ROUTINE PATROL IN THE AREA WHERE THE WEAPON WOULD BE AUTHORIZED FOR USE OR OTHERWISE IMPAIR THE EFFORTS OF LAW ENFORCEMENT OFFICERS IN THE AREA TO CONTROL CRIME AND CIVIL DISTURBANCE.

(6)

22 CFR Part 126, Supplement No. 1

In 22 CFR Part 126, Supplement No. 1, category I (a-e) (firearms and related articles), mark all three country boxes with an X.

In 22 CFR Part 126, Supplement No. 1, category II (a) (guns and armament), mark all three country boxes with an X.

In 22 CFR Part 126, Supplement No. 1, category III (ammunition and ordinance), mark all three country boxes with an X.

(7)

22 CFR 129.7 (b)

Amend 22 CFR 129.7 (b) to add the following:

(b) No person may engage in or make a proposal to engage in brokering activities that involve any country, area, or person referred to in § 126.1 of this subchapter without first obtaining the approval of the Directorate of Defense Trade Controls. NO PERSON MAY ENGAGE IN OR MAKE A PROPOSAL TO ENGAGE IN BROKERING ACTIVITIES THAT INVOLVE EXPORTING OR TRANSFERRING, TO A NON-GOVERNMENT PERSON, A FIREARM OR AMMUNITION WITH MUZZLE ENERGY GREATER THAN 5,000 JOULES (3,688 FOOT-POUNDS), OR ASSOCIATED EQUIPMENT. NO PERSON MAY ENGAGE IN OR MAKE A PROPOSAL TO ENGAGE IN BROKERING ACTIVITIES THAT INVOLVE EXPORT OR TRANSFER, TO A NON-GOVERNMENT PERSON, OF A FIREARM OR AMMUNITION WITH MUZZLE ENERGY LESS THAN 5,000 JOULES (3,688 FOOT-POUNDS) OR ASSOCIATED EQUIPMENT IF THE ITEM IS LIKELY TO OUTMATCH LAW ENFORCEMENT OFFICERS ON ROUTINE PATROL IN THE AREA WHERE THE ARTICLE WOULD BE AUTHORIZED FOR USE.

Thank you for the opportunity to submit comments on the ITAR amendment.

Sincerely,

William A. Root Erick Williams

As of: November 29, 2018 Tracking No. 1k2-93yn-fm32 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0387</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Steve Delturk

General Comment

The administration makes it clear that its priority is on profit of a few of the most wealthy Americans rather than on human life when it makes it easier to send guns out to the rest of the world while making it harder for people fleeing violence to come into the United States for safety (and detains the families of many who do).

The US has historically supported arming groups overseas who use the arms to cause massive amounts of harm to innocent people (arming the Saudi coalition's current war in Yemen, which the UN has described as the world's worst humanitarian crisis, is a clear example). The US's actions in arms exports not only harm innocent people overseas, but they also come back to harm Americans. The United States provided arms that allowed Al-Qaeda to thrive under Osama Bin-Laden, and he later orchestrated the most devastating terrorist attack to occur on United States soil in history. Although, in practice, US arms often get into the hands of those who kill innocents and violate human rights, one of the few regulations that we have to protect human rights and human lives is the restrictions that are placed on items that are on the USML list.

Guns have no shelf-life and will operate as long as they are maintained. They are not regular products for trade but machines designed to end human life. Moving guns from the USML to the CCL will put even less regulation on gun exports from the US - to do so is to empower those who would kill innocents to make it easier to acquire guns overseas, for the financial benefit of wealthy American gun manufacturers. These guns could be used for generations, ending lives, traumatizing families and communities, and threatening the US's national security.

In making this decision, the Department of State must decide whether the profits of a few wealthy gun manufacturers are worth this blatant disregard for the sanctity of human life. At a time when protests against gun violence have reached an all-time high, it also must consider if it is ready for the backlash from the American public it will face in making these decisions and if it is ready to be written into history as an administration that enabled the perpetuation of gun violence to an even higher degree. The majority of the American people who have not had to live with gun violence in their daily lives, unlike those of us who live in violence afflicted-cities and have long known the problem intimately, are more

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aware of gun legislation and its consequences than ever before, and I believe they will not be silent on this decision and will hold all decision makers accountable.

For respecting the sanctity of the lives of individuals overseas who may be affected by this decision, for the national security of the United States, and for its own legacy, it is my hope that the Department of State under this administration will choose to keep semi-automatic firearms on the USML, where there are greater protections to prevent guns from getting in the hands of actors that are known human rights abusers and greater protections to prevent guns being trafficked on the black market.

As of: November 29, 2018 **Tracking No.** 1k2-93yn-zqmq **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0388</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93yp-l6x3 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0389</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Adrienne Heinzelman

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93yq-ihjz **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0390</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Erick Williams

General Comment

This is a copy of the comments submitted to the Department of Commerce on the EAR amendments.

Attachments

EAR amendment comment 22 Jun 18

Erick Williams, JD 1209 Old Hickory East Lansing, MI 48823

June 22, 2018

Regulatory Policy Division
Bureau of Industry and Security
US Department of Commerce
14th St and Pennsylvania Ave, NW, Room 2099B
Washington, DC 20230
http://www.regulations.gov

Re: Docket No. BIS-2017-0004; RIN 0694-AF47

Greetings:

These are comments on the Commerce Department proposed rule, "Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control under the United States Munitions List." 83 Federal Register 24166, May 24, 2018, https://www.federalregister.gov/documents/2018/05/24/2018-10367/control-of-firearms-guns-ammunition-and-related-articles-the-president-determines-no-longer-warrant

Background

The rules governing firearm exports should give the police profession a greater, better-defined role in the evaluation of firearm export license applications.

15 CFR 738.2 (d) (2) (ii) (A) (CC) provides that items proposed for export are controlled for "crime control" reasons. The practice of controlling exports for crime control reasons reflects a basic principle

underlying arms control treaties and statutes. The proliferation of weapons should be controlled because it tends to impair the rule of law.

To assure that the rule of law is not impaired by firearm exports, licensing officials should consider the effect of proposed exports on local communities, public safety, peace officer safety, crime control, and control of civil disturbances.

In several parts of the world, armed gangs are impairing the rule of law, and their activities cross borders. As a major producer of firearms, the USA, through export law enforcement, can help limit the flows of weapons to armed gangs. The police profession, closely associated with the rule of law, is a critical stakeholder in the arms export licensing process.

Unfortunately, neither the current nor the proposed rules governing firearm exports provide for export license applications to be vetted by people with police backgrounds.

Historically, the weapons analysts who vet arms export licenses have been with the Defense Department. Military analysts worry (as they should) about the impact of weapons on the battlefield. But defense analysis does not necessarily evaluate transactions with an eye to the security needs of civilian communities -- public safety, peace officer safety, crime control, and the prevention and management of civil disturbances.

Firearms that "no longer warrant control" by the military can nonetheless destabilize communities, overwhelm peace officers and contribute to civil disorder.

Notorious examples of the adverse effects of firearm proliferation have come from Africa and the Middle East as well as closer to home -- Mexico and Central America.

See: Alec MacGillis, "America's Wild-West Gun Laws Are Helping Fuel The Border Crisis: The Unwanted Traffic Between The Us And Central America Goes Both Ways" (New Republic, July 21, 2014), https://newrepublic.com/article/118759/nra-and-gun-trafficking-are-adding-fuel-border-migrant-crisis

Robert Muggah and Steven Dudley, Op-Ed: "*The Latin American Gun Leak*", (Los Angeles Times, January 16, 2015), http://www.latimes.com/opinion/op-ed/la-oe-muggah-arming-latin-america-20150118-story.html

"Attacks Against Peacekeepers" (United Nations OHCHR, May 2017), https://www.ohchr.org/Documents/Countries/CF/Mapping2003-2015/Factsheet7-EN.pdf

"Attacks against civilians and MINUSCA peacekeepers in the town of Bangassou in the Central African Republic" (Office of the Spokesperson for the UN Secretary-General, May 14, 2017) https://www.un.org/sg/en/content/statement/2017-05-14/statement-attributable-spokesman-secretary-general-attacks-against

Alex Yablon, "American Guns Drive the Migrant Crisis that Trump Wants to Fix with a Wall" (Trace, May 25, 2017) https://www.thetrace.org/2017/05/gun-trafficking-central-america-immigrant-crisis-trump-wall/

Jonathan Blitzer, "The Link Between America's Lax Gun Laws and the Violence That Fuels Immigration" (New Yorker, March 22, 2018), https://www.newyorker.com/news/news-desk/the-link-between-americas-lax-gun-laws-and-the-violence-that-fuels-immigration

Highly destructive weapons should not be exported to civilians.

Whatever short term economic benefit those exports may generate is outweighed by the risk those weapons pose to the safety of peace officers and the rule of law.

We suggest a maximum limit on firepower exported to civilians. Firearms with a muzzle energy higher than 5,000 Joules should be barred from export to non-government end-users. (In ballistics, muzzle energy, commonly expressed in Joules or foot-pounds, is a measure of the destructive potential of a firearm or cartridge. Tables comparing the muzzle energies of various firearms are available on the Internet.)

See: "Clear and Present Danger: National Security Experts Warn About the Danger of Unrestricted Sales of 50 Caliber Anti-Armor Sniper Rifles to Civilians" (Violence Policy Center, July 2005), http://www.vpc.org/studies/50danger.pdf

Weapons of high destructive potential have no place on any street in the world, and they should be off-limits for export to civilians.

Policy Recommendations

The following changes should be incorporated in the new rules:

- 1. Prohibit export of firearms, above a maximum limit of destructiveness, to civilian end-users, world-wide. A muzzle energy of 5,000 Joules (3,688 foot-pounds) is here proposed as the maximum limit.
- 2. Prohibit exports of firearms with muzzle energies less than 5,000 Joules, to civilian end-users, world-wide, if the firearm is likely to outmatch weapons carried by local peace officers or otherwise impair the efforts of peace officers to control crime and civil disturbance.

3. Recognize the police profession as a stakeholder in firearm exports. Give the profession a role in vetting license applications.

Technical Language

The recommendations above may be translated into the EAR framework using the technical language below.

- 4. In 15 CFR Appendix Supplement No 1 to Part 738, the Commerce Country Chart, add a column 4 under crime control. Mark each country box to indicate that the crime control reason for control applies to all countries.
- 5. In 15 CFR 738.2 (d) (1), reason for control item 5. Amend item 5 to read (changes in CAPS):
 - 5: Items warranting national security, CRIME CONTROL, or foreign policy controls at the determination of the Department of Commerce.
- 6. In 15 CFR 738.3 (a) (1) add a sentence that reads: A LICENSE IS REQUIRED FOR ALL DESTINATIONS FOR FIREARMS AND ASSOCIATED EQUIPMENT CONTROLLED UNDER ECCN 0A501, 0A502, 0A504, AND 0A505, WHICH ARE SUBJECT TO 15 CFR 742.7 (b) (2) or (b) (3).
- 7. In 15 CFR Appendix Supplement No 1 to Part 774, the Commerce Control List, add crime control as a reason for control under 0A501, 0A502, 0A504, and 0A505. CC column 4 (referred to above) should apply to each, entire entry. In each entry, insert: ALL ITEMS ARE SUBJECT TO THE CRIME CONTROL LICENSING POLICY IN 15 CFR 742.7 (b) (2) or (b) (3).
- 8. Amend 15 CFR 742.7 (b) to read as follows (changes in CAPS):

- (b) Licensing policy.
- (1) EXCEPT AS DESCRIBED IN (b) (2) and (b) (3) BELOW, applications for items controlled under this section will generally be considered favorably on a case-by-case basis unless there is civil disorder in the country or region or unless there is evidence that the government of the importing country may have violated internationally recognized human rights. The judicious use of export controls is intended to deter the development of a consistent pattern of human rights abuses, distance the United States from such abuses and avoid contributing to civil disorder in a country or region.
- (2) A LICENSE APPLICATION FOR A FIREARM WITH MUZZLE ENERGY OF 5,000 JOULES (3,688 FOOT-POUNDS) OR MORE (AND EQUIPMENT ASSOCIATED WITH THE FIREARM) SHALL BE DENIED TO NON-GOVERNMENT END-USERS.
- (3) A FIREARM WITH MUZZLE ENERGY LESS THAN 5,000 JOULES (3,688 FOOT-POUNDS), AND EQUIPMENT ASSOCIATED WITH THE FIREARM, MAY BE APPROVED TO NON-GOVERNMENT END-USERS UNLESS THE FIREARM WOULD TEND TO OUTMATCH WEAPONS NORMALLY CARRIED BY PEACE OFFICERS ON ROUTINE PATROL IN THE AREA WHERE THE WEAPON WOULD BE USED OR OTHERWISE IMPAIR THE EFFORTS OF PEACE OFFICERS IN THE AREA TO CONTROL CRIME AND CIVIL DISTURBANCE.
- 9. In 15 CFR Appendix Supplement No 2 to Part 730, Technical Advisory Committees, allow creation of a technical advisory committee with representation from the police profession to provide technical

advice on matters such as police procedure, public safety, peace officer safety, crime control, and control of civil disorder. At least two organizations in the United States -- one federal and the other state-based – may be competent to give the Commerce Department technical advice on police standards outside the USA. They are the International Criminal Investigative Training Assistance Program, https://www.justice.gov/criminal-icitap, and the International Association of Directors of Law Enforcement Standards and Training, https://www.iadlest.org.

Thank you for the opportunity to submit comments on the proposed rules.

Sincerely,

Erick Williams, JD

As of: November 29, 2018 **Tracking No.** 1k2-93yt-nry0 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0391</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Rachelle Fish

General Comment

We urge you to reverse the proposed regulations that would make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere. We have seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence should be made stronger, not weaker.

As of: November 29, 2018 Tracking No. 1k2-93z4-29mn Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0392</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: carl tyndall

General Comment

Please set the record straight. I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93zb-2h9i **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0393</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Katrina Kelly

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce. This is because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93zb-2txb Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0394</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Claudine Thies

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93zb-f00c Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0395</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Hansen

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93zd-ecn4 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0396</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Melissa Brady

General Comment

COPY SCRIPT: "I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93ze-hhkt **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0397</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: MAryse Levenson

General Comment

"I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce

because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed

conflicts, and the civilian possession of such weapons is prohibited in many countries.

The proposed rule also: eliminates Congressional oversight

for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers;

and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency

with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade

and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism,

and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93zf-r2is **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0398</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Babbitt

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. It reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. We need more, not fewer, controls on firearms.

As of: November 29, 2018 Tracking No. 1k2-93zi-14vi Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0399</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: sean schroeder

General Comment

I Agree the Proposed rule.

As of: November 29, 2018 **Tracking No.** 1k2-93zr-8lwg **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0400</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Paul Sacilotto

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. In addition, converting these weapons from semi to automatic fire is not difficult. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers (socializing the risk, privatizing the gain); and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The unintended consequence of this action would be to label the United States as the Merchants of Death. These firearms should be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93zw-up6d **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0401</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Please Don't Do It! I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-9401-nfmw Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0402</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Phil Steinschneider

General Comment

Amendments to the International Traffic in Arms Regulations are very welcome. As a Type 01 Federally Licensed Firearms dealer, our company has been waiting for this change to happen for several years. It will allow us to expand our operations into manufacturing and export, which will potentially make it possible for us to create new jobs and new opportunities for workers within our company, as well as the various vendors that supply us.

On the other hand, several proposed changes fall short of what we were expecting.

Why are suppressors not being placed on the CCL? These are in common use throughout the United States and in Europe. In some European countries, silencers are not regulated at all, or much less regulated than in the US. Put suppressors on the CCL in order to stimulate innovation among US-based manufacturers. This makes even more sense if suppressors are eventually removed from the National Firearms Act, which is quite possible in the future.

It makes no sense to continue leaving firearm technologies that have been around for over 100 years under ITAR. This appears to be a political decision rather than a logical one. Move common automatic weapons to the CCL.

Due to their heavily-regulated nature, automatic firearms will be still difficult to export. Leaving them under ITAR will only hurt the US, as it will continue to constrain less well-heeled small arms manufacturers, who might develop the next Thompson SMG, M1 Garand, or M16. Does no one wonder why automatic firearm technology has been at a standstill essentially for over 60 years?

All of Category I should be moved to the CCL. Items of likely greater concern fall under Category II and Category III. The revisions to those sections will of course depend on the items enumerated in the changes.

As a Type 01 FFL, we are looking forward to these reforms in order to acquire a Type 07 license. Because we are a small concern, the ITAR fee has have been a barrier to entry for us. We will still feel

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constrained by the omission of suppressors and commonly-available automatic weapons from these changes, however. If these had been placed on the CCL, we would have become a Type 07/SOT. Under the current proposal, an 07/SOT will be required still to pay the ITAR fee.

These rules have always been complex, so simplification and clarification are appreciated. Those who would violate them will do it despite these regulations, however. The only companies that benefit from any remaining complexity technologies moved to the CCL are those with the capital and resources to hire entire compliance departments at the expense of productive activity. The time and money wasted complying with ITAR could so much more easily be used for the development of new technologies and new jobs for Americans.

Nonetheless, these changes are certainly welcome, and will go a long way to help make the American defense industry more competitive the worldwide defense article marketplace.

As of: November 29, 2018 **Tracking No.** 1k2-9413-3as9 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0403</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Dean Hornsby

General Comment

Why do you people have the ludicrous perception that any legislation you pass is going to stop anyone from committing crimes?

Words on a piece of paper, which you refuse to read before voting on them, are as useless as the ink used to write them. As

quoted from John Dean "Jeff" Cooper "Killing is a matter of will, not weapons. You can't control the act itself by passing laws

about the means employed."

Jeff Cooper, 1958

As of: November 29, 2018 **Tracking No.** 1k2-9415-ap08 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0404</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Julie Stern

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

As of: November 29, 2018 **Tracking No.** 1k2-9415-s62d **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0405</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

As of: November 29, 2018 **Tracking No.** 1k2-9416-fqkl **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0406</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: M M

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. I cannot support any action that will endanger the lives of American citizens overseas and this change will make it easier for terrorists and foreign entities to secure American-made firearms, including deadly assault weapons, for killing Americans living, working, or traveling abroad.

In my view, the proposed rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. If your agency approves this blatant corporate giveaway and vast disregard for national security, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board.

I am submitting this comment anonymously as the NRA and their syncophants use threatening language against anyone who questions their reasoning, data, or motivations. This is a matter of national security. Please wake up.

As of: November 29, 2018 **Tracking No.** 1k2-9419-qj24 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0407</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Garitty

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-941a-puc6 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: <u>DOS-2017-0046-0001</u>

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0408</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jordan Gochman

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-941c-sa8l Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0409</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Samantha Turetsky

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-941d-vtce Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0410</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

In the matter of the proposed changes to how ITAR is implemented I would like to raise several points of concern.

First let me say that I welcome nearly all the changes as proposed. My professional background is in ammunition manufacturing. I have patented my own invention and am called upon to act in the capacity of an expert witness in legal matters. In addition to the 20+ years experience I have spent 12 years running the local 4-H Shooting Sports Program in my county. During that time youth from my club have competed in many local and national events. Many have medaled in big matches including one national champion in air rifle.

Concern #1.

The dollar value placed on exporting bullets (not loaded ammunition) seems impossible to actually kick in and out of skew with the rest of the proposed levels for other items. In many cases this would limit the buyer to only a single box of bullets. Many boxes of bullets, especially ones that are not made in but one or two countries are quite expensive. For example the following is the cost for a box of just 50 bullets.

```
.348 250 gr = $43.50

.33 200 gr = $41.00

38-55 255 gr = $41.00

.408 350 gr = $46.00

.404 350 gr = $59.00

.425 400 gr = $66.00

43 Spanish 400 gr = $46.00

.475 #2 500 gr = $106.50

50-110 450 gr = $54.50

50-70 450 gr = $54.00

.505 500 gr = $72.00

.577 650 gr = $83.50
```

Also many common caliber bullets made as a premium hunting bullet in a special weight are equally expensive per bullet.

30 cal 250 gr = \$45.50

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```
32 Rem 170 gr = $40.00 w/ minimum of 3 boxes
.358 300 gr = $63.50 w/ minimum of 3 boxes
.416 400 gr = $50.50
.458 500 gr = $111.50
50 cal 500 gr = $68.00
```

Based upon the other covered items in ITAR it would seem that the \$100.00 is just too low and should be \$300.00 minimum to allow someone with a small purchase of 200 300 bullets to reload for an older or odd hunting rifle. This is applicable to brass cartridge cases as well. And both are often purchased together. In all fairness ammunition components should be equal to the \$500.00 level assigned to gun parts.

Concern #2.

International competition in small bore rifle may be hurt with the 1,000 round limits on ammunition. Many matches require 100 or 200 shots for record. Usually the event has several days of competition. The match starts with sighters and if conditions are difficult (wind, lighting, and mirage) the rounds fired as sighters in a match can approach the number needed for record. Usually long distance travelers are given the day ahead to check everything and practice before the actual event. A junior shooter competed in Europe then visited the MEC shooting complex for one on one training before returning to the states. The days training was valuable and worth using double the amount of ammunition used in a two day competition. Certain unusual matches require many more record shots. The metric prone event is two days long and consists of 600 record shots. For these reasons I recommend making an exception for small bore 22 rimfire ammunition and allowing 2,000 rounds when traveling out of the country. I am not aware of the requirements for shotgun competitions but thing they are in a similar situation. Gold medalist Kim Rhode practices with 800 shots a day. Perhaps the exemption can be specified for competitors.

Thanks for the changes to come.

As of: November 29, 2018 Tracking No. 1k2-941p-rook Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0411</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

As of: November 29, 2018 Tracking No. 1k2-941p-dzuj Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0412</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: sandra matlow

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode and these weapons are used by state and non-state groups in armed conflicts.

The proposed rule eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources or the interest to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-941s-8o6a **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0413</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Rachel Graber

General Comment

See attached comments

Attachments

Comment on DOS-2017-0046

As a domestic violence prevention advocate, I know full well the toll gun violence takes on women across the world. Abusers' use of firearms to threaten, control, injure, and kill knows no borders or boundaries. I oppose the proposed rule for the following reasons:

- 1. The proposed rule treats semi-automatic assault rifles as "non-military." But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.
- 2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey. Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress' proper role.
- 3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.
- 4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.
- 5. The rule reduces end-use controls for gun exports. It would eliminate the State Department's Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Government's information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter's history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.
- 6. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is

- unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.
- 7. The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce. The BIS's enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.
- 8. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.
- 9. This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.
- 10. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.^{iv} The export of these weapons should be subject to more controls, not less.

¹ "US lawmakers balk at arms sales to Saudi Arabia, Turkey and Nigeria," *DefenseNews*, Sept. 26, 2017, https://www.defensenews.com/congress/2017/09/26/us-lawmakers-balk-at-arms-sales-to-saudi-arabia-turkey-and-nigeria/

[&]quot;Arms Dealer Faces New Charges," New York Times, Aug. 23, 2010, https://www.nytimes.com/2010/08/24/us/24arms.html

Department of Commerce Budget in Brief FY2017, p. 57,

http://www.osec.doc.gov/bmi/budget/FY17BIB/AllFilesWithCharts2.pdf

Ongoing resource on "Cross Border Gun Trafficking: An Ongoing Analysis of the Types of Firearms Illegally Trafficked from the United States to Mexico and Other Latin American and Caribbean Countries as Revealed in U.S. Court Documents," by the Violence Policy Center, http://www.vpc.org/indicted/

As of: November 29, 2018 **Tracking No.** 1k2-941t-9hv6 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0414</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Sheba McCants

General Comment

I oppose the proposed rule for the following reasons:

- 1. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.
- 2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey. Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.
- 3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government -- i.e., taxpayers -- will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.
- 4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for

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brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.

- 5. The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.
- 6. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

As of: November 29, 2018 **Tracking No.** 1k2-941u-noso **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0415</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Sarah Doenmez

General Comment

Do NOT re-classify semi-automatic weapons as commercial items. These weapons have been used in horrendous acts of violence all over the world. The US should not be a state that sells violence to the world, profiting from human rights abuses.

Sincerely, Sarah Doenmez Dublin, NH 03444

As of: November 29, 2018 Tracking No. 1k2-941x-qps1 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0416</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jodi Domanic

General Comment

I strongly oppose this proposed rule which would transfer oversight of regulations on certain firearms from the State Department to the Commerce Department. The only Americans lobbying for this change is the gun lobby and while they may be very vocal, they are not the majority of U.S. citizens. This action will only serve to put even more guns into our country ... our country that already is #1 in guns per person as well as deaths from guns by far of civilized countries. We are reminded on a daily basis of how dangerous our country is partly because of lenient regulations regarding firearms. We NEED to stop the bleeding!! Literally & figuratively. Please oppose this proposed rule!!

As of: November 29, 2018 Tracking No. 1k2-9420-zf5t Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0417</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I completely oppose this proposed rule. The US government should not be taking orders from the NRA, which fears losing sales in the US because of right and righteous concerns over gun violence, and so wishes to export its means of profiting. This should not be US policy, human policy, or international relations. It is a transparent give-away to forces that will only further disrupt and derail Mexico's efforts to police its drug traffickers and curb its corruption.

Please reject this proposal.

As of: November 29, 2018 Tracking No. 1k2-9420-2zn7 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0418</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Fred Granlund

General Comment

I am writing to OPPOSE the proposed rule changes on grounds of excessive danger to civilians and lack of accountability to keep weapons out of the hands of terrorists and others working against our national interests. My specific objections are listed in the attached document: arms sales.rtf.

Thank you for your consideration of my comments.

Attachments

arms sales

Reasons to OPPOSE International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

- 1. The proposed rule treats semi-automatic assault rifles as "non-military." But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.
- 2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[ii] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress' proper role.
- 3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government -- i.e., taxpayers -- will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.
- 4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[iii]
- 5. The rule reduces end-use controls for gun exports. It would eliminate the State Department's Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Government's information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter's history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of

these firearms from the State Department database, weakening enforcement against arms trafficking.

- 6. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.
- 7. The Commerce Department does not have resources to enforce export controls, even before the addition of 30,000 firearms export licenses as a result of this rule predicted by Commerce.[iv] The BIS's enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.
- 8. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.
- 9. This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.
- 10. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[v] The export of these weapons should be subject to more controls, not less.

As of: November 29, 2018 Tracking No. 1k2-9421-27on Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0419</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Benita J. Campbell

General Comment

As a citizen of the United States, I have grave concerns about our violent gun culture that does so much harm to individuals, families, and society at large.

I oppose the proposed rule for the following reasons.

- 1. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.
- 2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[ii] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.
- 3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the

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cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

- 4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[iii]
- 5. The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

As of: November 29, 2018 **Tracking No.** 1k2-9422-pkee **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0420</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Gary Smith

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer. We've lost our moral compass if we agree to this shift in oversight.

As of: November 29, 2018 Tracking No. 1k2-9422-68qw Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0421</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Sarah Brown

General Comment

I hope you will oppose the Trump Administration's proposal to transfer licensing and oversight of firearms exports from the State Department to the Commerce Department. The proposal weakens controls over semiautomatic assault weapons, .50 sniper rifles, high-capacity ammunition magazines and it may deregulate 3D printing of guns. It could also weaken controls on gun imports.

The proposed transfer will likely lead to more U.S. guns getting into the hands of criminal organizations, human rights abusers, and terrorist groups around the globe.

It's no surprise that the proposed rules are a priority for the National Rifle Association and the Newtown-based National Shooting Sports Foundation. Clearly, their goal is to open up international markets to compensate for lagging domestic sales. They are willing to spread our gun violence all over the world to boost gun industry profits.

As of: November 29, 2018 **Tracking No.** 1k2-9425-s8xl **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0422</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jean Lindgren

General Comment

I'm a long time resident of San Francisco, California and am absolutely appalled by the hundreds...thousands...of people being killed by unstable humans...mainly white males...wielding automatic and semi-automatic weapons!!!! This MUST STOP! NO CIVILIAN NEEDS SUCH A WEAPON!!!!

Therefore, I strongly oppose the proposed rule for the following reasons:

- 1. It eliminates Congressional oversight for important gun export deals.
- 2. Transfers the cost of processing licenses from gun manufacturers to taxpayers. That's totally wrong and unfair.
- 3. Removes statutory license requirements for brokers thereby increasing the risk of trafficking.
- 4. Reduces or eliminates end-use controls, such as the State Depts Blue Lantern program...eliminating registration of firearms exporters has been a requirement since the 1940s for very good reasons!
- 5. Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- 6. Reduces transparency and reporting on gun exports.
- 7. Transfers gun export licensing from the agency with a mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.
- 8. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!
- 9. Ideally, automatic and semi-automatic weapons should be removed from the market entirely and not manufactured in the first place.

Thanks for your consideration. Jean Lindgren

San Francisco, CA

Email: lindgren.b8@gmail.com

As of: November 29, 2018 Tracking No. 1k2-942b-es0y Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0423</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Terrie Williams

General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[ii] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government -- i.e., taxpayers -- will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain

Case 2:20-cv-00111-RAJ Document 106-24 Filed 09/23/20 Page 365 of 676

rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[iii]

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

As of: November 29, 2018 **Tracking No.** 1k2-942f-pfzz **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0424</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Rebecca Berlant

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-942g-x628 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0425</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Garry Black

General Comment

I whole heatedly support moving the small arms ammunition control from the State Department to the Commerce Department. The Bureau of Industry Control in Commerce will adequately monitor the shipment of these items.

As of: November 29, 2018 Tracking No. 1k2-942g-i5tc Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0426</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Deirdre Dreslough

General Comment

Please leave the regulations as they stand. The more oversight for weapons sales and exports, the better. This is just a play for profits by a few organizations and companies and the USA, and the pain and inhumanity these weapons will bring to other nations will be a stain upon our national soul; all our souls. If anything, increase regulations on weapons exports, or eliminate them entirely. Please uphold the peaceful wishes of the majority of Americans.

"I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house."

As of: November 29, 2018 Tracking No. 1k2-942g-nv6o Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0427</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Don't export our firearms problems. Don't further line the pockets of the merchants of death.

As of: November 29, 2018 Tracking No. 1k2-942h-zfob Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0428</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Angel Marks

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

As of: November 29, 2018 Tracking No. 1k2-942h-ngnl Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0429</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Suzanne Darweesh

General Comment

Is this the reputation we want as the leading economy in the world, to be producer and exporter of arms and military supplies? I think not. Remember how the world respected us during and after the Marshall Plan. Let's change our reputation to one that accepts refugees and promotes the economies of developing nations so that they can achieve self-sufficiency, jobs and food for their own people and the migration of people seeking a better life and safe existence will decrease. We produce more weapons than the next 5 economies put together! What a reputation! I am opposed to any sale of weapons to any third world countries.

As of: November 29, 2018 **Tracking No.** 1k2-942h-eq7t **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0430</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Pamela Johnston

Organization: i.am.not.a.company

General Comment

I wish to speak out against this proliferation of weapons used in war and crime, as follows:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

As of: November 29, 2018 **Tracking No.** 1k2-942h-gjzv **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0431</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Cynthia Hood

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one else asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

As of: November 29, 2018 **Tracking No.** 1k2-942h-n6kg **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0432</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[ii] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government – i.e., taxpayers – will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

Case 2:20-cv-00111-RAJ Document 106-24 Filed 09/23/20 Page 375 of 676

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

The export of these weapons should be subject to more controls, not less.

As of: November 29, 2018 **Tracking No.** 1k2-942i-tbw3 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0433</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Karri Allen

Organization: Raytheon Company

General Comment

Please see attached.

Attachments

Raytheon Company Comments DDTC USML Cat I II III (83 Fed Reg 24198) (filed 2018-07-03)

July 3, 2018

U.S. Department of State Directorate of Defense Trade Controls PM / DDTC, SA-1 12th Floor 2401 E Street, NW Washington, DC 20522 Via: www.regulations.gov

Subject: Raytheon Company Comments on USML Categories I, II, and III

Ref: 83 Fed. Reg. 24198 (May 24, 2018)

Docket ID: DOS-2017-0046

On May 24, 2018 the Department of State, Directorate of Defense Trade Controls ("DDTC") requested comments from the public on the proposed rule to amend United States Munitions List ("USML") Categories I, II, and III. Below please find comments from Raytheon.

USML Category II

Raytheon strongly supports the addition of Note 2 to paragraph (a) and the Note to paragraph (j)(9) because they help distinguish Category II items from items more appropriately controlled in other USML Categories. Regarding Note 2 to paragraph (a), we recommend the modifications underlined below to utilize the same language from Category VII (i.e. add the words "and trailers") to direct that guns and armament when affixed to trailers that are armed or are specially designed to be used as a firing or launch platform to deliver munitions or otherwise destroy or incapacitate targets are otherwise controlled under Category VII. Directly similar to the concept currently embodied in the Note 2 to paragraph (a), we recommend that language be added to this Note to clearly indicate that active protection systems specifically defined in categories associated with the carrier are controlled under those other categories.

Note 2 to paragraph (a): Guns and armament when integrated into their carrier (e.g., ships, ground vehicles <u>and trailers</u>, or aircraft) are controlled in the category associated with the carrier. <u>Similarly, guns and armament when integrated into an active protection system described in the category associated with the carrier are controlled in the active protection system category associated with the carrier. Self-propelled guns and armament are controlled in USML Category VII. Towed guns and armament and stand-alone guns and armament are controlled under this category.</u>

Regarding the Note to paragraph (j)(9), we recommend the following modification (underlined below) to continue the drive for clarity:

Note to paragraph (j)(9): For weapons mounts specially designed for ground vehicles, see Category VII. For weapons mounts specially designed for vessels, see Category VI.

Raytheon Company Comments on Proposed Rule - USML Categories I, II, and III July 3, 2018 Page 2 of 2

Brokering

The conforming change proposed for 22 C.F.R. § 129.1(b) improves readability. The proposed language for 22 C.F.R. § 129.2(b)(2)(vii) appears to provide a broad carve-out to the brokering activities definition. It would be helpful for DDTC to clarify whether this language was intended to convey that any ITAR or EAR approval for the items in question is sufficient to meet this criteria and that the approvals do not have to list the specific consignees or end users as the future export, reexport, or transfer. If this was not what was intended, then the proposed language for 22 C.F.R. § 129.2(b)(2)(vii) should be modified to indicate this, such as (additions underlined):

(vii) Activities by persons to facilitate the export, reexport, or transfer of an item subject to the EAR that has been approved pursuant to a license or license exception under the EAR or a license or other approval under this subchapter <u>involving only parties approved under that license or other approval</u>.

Effective Date

Raytheon strongly supports using a delayed effective date of 180 days as has been done for other USML to CCL transitions. Such transitions require updates to IT systems, policies, processes, and training which require time to complete. Based on experiences in performing these tasks during previous transitions, the full 180 days is necessary.

We appreciate the ability to comment and thank you for your partnership.

* * *

As of: November 29, 2018 Tracking No. 1k2-942j-61z5 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0434</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Sandra Derr

General Comment

Why are we the world's #1 arm producer and sales to others!

We should be selling plows instead of "swords."

NO MORE SALES OF GUNS needed in this heavily armed world.

As of: November 29, 2018 Tracking No. 1k2-942j-t1e8 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0435</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Adele Riffe

General Comment

The Trump administration has proposed to make it easier for U.S. gun makers to export guns and ammunition globally, even though U.S.-exported firearms are already used in countless crimes, attacks and human rights violations in Latin America, the Middle East, Africa and around the world.

The proposal would move export licenses for semi-automatic assault weapons, sniper rifles, and other powerful firearms from the State Department to the Commerce Department, removing Congressional oversight, weakening controls on who ends up with the weapons and even lifting restrictions on 3D printing of guns that would permit production of guns both overseas and here at home. The U.S. gun industry and the NRA have pushed hard for these changes to make up for falling gun sales. The Commerce Department estimates that the proposed change would apply to 10,000 gun export applicants a year.

Please do not allow any weakening of controls or restrictions on gun and ammunitions licensing, sales and/or production - either nationally or abroad. We need common-sense restrictions on guns. The NRA just wants to sell more guns, to improve its profits. It does not care that its actions have direct consequences on our lives, increasing the probablity that someone we love might be involved in gunrelated violence.

As of: November 29, 2018 **Tracking No.** 1k2-942j-mqd9 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0436</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Marie Lucey

Organization: Franciscan Action Network

General Comment

My name is Marie Lucey and I am a Catholic Franciscan Sister, Assistant Director of Franciscan Action Network (FAN) based in DC with thousands of members across the country. We are a member of Faiths United to Prevent Gun Violence and take every opportunity to address the gun violence epidemic in our country so wish to oppose the proposed rule for many reasons including the following: State and Commerce Departments have different missions, roles and purposes.

The proposed rule would eliminate Congressional oversight for major gun export deals and would limit the ability of Congress to comment on related human rights concerns. In a September, 2017 letter, Senators Ben Cardin (Senator of MD in which I reside), Feinstein and Leahy noted that this move would violate Congressional intent and eliminate Congress' proper role.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. Unless corrected, the new regulations run the risk of condoning and enabling 3D printing of firearms in the U.S. and elsewhere.

Firearms are used globally to kill a thousand people every day in acts of organized crime, political violence, terrorism, and human rights violations. Military-style assault rifles and ammunition, which would be transferred to Commerce control, are weapons of choice for criminal organizations in Latin American countries that are responsible for most of the record levels of homicides in these countries. Export of such weapons should be subject to more, not fewer, controls.

As of: November 29, 2018 **Tracking No.** 1k2-942j-5gd7 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0437</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Karen Wolff

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

As of: November 29, 2018 Tracking No. 1k2-942k-gpzt Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0438</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

As of: November 29, 2018 **Tracking No.** 1k2-942k-x1je **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0439</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Val Mobley

General Comment

Moving this function to Commerce is a frightening idea. There will be no checks or safeguards to keep these weapons out of the hands of foreign powers whose intentions cannot be known. These weapons can likely end up in the hands of those who would harm our country. The sale of these weapons must be more than just an economic decision. The Department of State is the only agency who can maintain the safety of the US. This idea is an obvious ploy of the gun lobby to remove any semblance of regulation. Please don't fall for this!

As of: November 29, 2018 Tracking No. 1k2-942k-6hrv Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0440</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Hornik

General Comment

I am extremely concerned with gun violence against civilians both within the US and around the world, andI strongly oppose moving export licenses of assault weapons and other powerful firearms from the State Department to the Commerce Department. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts so this is a fiction. Additionally, many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

In fact, the proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons.

Additionally, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Hence, there is reason for considerable concern that firearms brokers will no longer be subject to US brokering law. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons now. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking.

Finally, the new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Why should citizens pay for gun exporters to profit? Its another absurd example of corporate welfare.

As of: November 29, 2018 **Tracking No.** 1k2-942k-7e79 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0441</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Ben Soreff

General Comment

As of: November 29, 2018 Tracking No. 1k2-942k-kovh Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0442</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Fred Sigworth

General Comment

Please maintain restrictions on the export of firearms!

As of: November 29, 2018 Tracking No. 1k2-942k-so2i Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0443</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Roslyn Kaplan

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-942k-e47a **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0444</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kenneth Foscue

Organization: CT Department of Public Health

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-942k-ock9 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0445</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Gibbs

General Comment

As of: November 29, 2018 Tracking No. 1k2-942k-oawz Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0446</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kirsten Bechtel

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-942k-8cct **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0447</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Claire Matthews

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-942k-u5tm **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0448</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Alexa Tomassi

General Comment

As of: November 29, 2018 Tracking No. 1k2-942k-5lbn Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0449</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: William Steinmayer

General Comment

I firmly oppose the decision to move the oversight on the sale of assault weapons from the Sate Department to the Department of Commerce. These weapons are strictly for military use, and should be treated as such.

As of: November 29, 2018 Tracking No. 1k2-942k-wev4 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0450</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Peter Gottschalk

General Comment

The loosening of firearm export rules fuels violence around the globe. There are two compelling reasons to not do so:

- 1. The basic moral wrong perpetuated by providing more lethal weapons used in ways that kill civilians and destabilize societies.
- 2. While most Americans may not appreciate the havoc wrought by our weapon exports, people across the globe recognize the weapons used to harm their families and friends, and damage their societies and economies. Many people understand who are the manufacturers of specific armaments and associate the nations from which they originate with the violence they perpetuate. This is a grassroots foreign policy disaster for the United States.

Please maintain if not strengthen the rules already in place.

Thank you for your consideration.

As of: November 29, 2018 **Tracking No.** 1k2-942k-8ew8 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0451</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Peter Hanson

General Comment

Please keep gun exports accountable and having oversight. Let's not export murder.

As of: November 29, 2018 **Tracking No.** 1k2-942k-j2hh **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0452</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Bert Goff

General Comment

As of: November 29, 2018 Tracking No. 1k2-942k-6zwx Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0453</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jeremy Stein

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war. Guns do no make us safer. Exporting more guns outside of the US would only make the rest of the world suffer the same amount of gun violence that is plaguing the US.

As of: November 29, 2018 **Tracking No.** 1k2-9421-edn2 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0454</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathy Chase

General Comment

As of: November 29, 2018 Tracking No. 1k2-9421-s69j Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0455</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

As a defense industry supporter, I support the movement of Category III small arms ammunition regulation from the State Department to the Commerce Department Control List of the Bureau of Industry and Security.

As of: November 29, 2018 **Tracking No.** 1k2-9421-8x7o **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0456</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jason Miller

General Comment

My name is Jason Miller and I am the Director of Campaigns and Development at the Franciscan Action Network in Washington, D.C. As a person of faith, I am extremely disturbed that guns are a major export of the United States and believe that gun export regulation is important. I oppose the proposed rule change because as Pope Francis said: there is a piecemeal world war III currently being waged and the United States is one of the biggest players. Instead we must work for diplomacy and peace.

As of: November 29, 2018 Tracking No. 1k2-942l-xsey Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0457</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Sloane Levy

General Comment

As of: November 29, 2018 Tracking No. 1k2-942l-ghmo Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0458</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jay Hoggard

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-9421-bdsg **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0459</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: James Curry

General Comment

As of: November 29, 2018 Tracking No. 1k2-9421-d9ic Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0460</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Erin Freed

General Comment

I am writing to oppose changing the rules so as to make it easier for U.S. firearm manufacturers to export assault rifles and other guns. We need the valuable oversight and accountability that is provided by the current law.

With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

Thank you.

As of: November 29, 2018 Tracking No. 1k2-942l-36qo Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0461</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Ken Overton

General Comment

As a defense industry supporter, I support the movement of Category III small arms ammunition regulation from the State Department to the Commerce Department Control List of the Bureau of Industry and Security.

As of: November 29, 2018 Tracking No. 1k2-942l-op0g Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0462</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Hosack

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-9421-f3uu **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0463</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Scott Schweizer

General Comment

As a veteran of the Persian Gulf War and a registered Republican I strongly oppose the export of guns. Please stop and oppose the gun lobbys agenda of profits over everything else.

As of: November 29, 2018 Tracking No. 1k2-9421-phbf Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0464</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Henry Lowendorf

General Comment

Our guns kill children everywhere. The government of the U.S.A. should not be in the business of promoting distribution of weapons around the world.

As of: November 29, 2018 **Tracking No.** 1k2-942m-o3mv **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0465</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Brown

General Comment

I am strongly OPPOSED to relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. Gun violence is a major killer, taking the lives of 1,000 people around the world every day! We should be making it harder, not easier, to export U.S. made weapons of war.

As of: November 29, 2018 **Tracking No.** 1k2-942m-o5tn **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0466</u> Comment on <u>DOS-2017-0046-0001</u>

Submitter Information

Name: Star Star

General Comment

switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Submit comments now to the State Department and the Commerce Department opposing the rule change.

- *You can copy and paste the points in this email or use your own voice to make unique comments to the State and Commerce Departments.
- U.S. Department of State: https://action.momsrising.org/go/38289?t=10&akid=11002%2E2254141% 2Ezo8aRS
- U.S. Department of Commerce: https://action.momsrising.org/go/38290?t=12&akid=11002%2E2254141% 2Ezo8aRS

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

As of: November 29, 2018 Tracking No. 1k2-942m-topd Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0467</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Cindy Ware

General Comment

I strongly urge our United States Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability.

Gun violence is a real and ever-increasing threat both here and abroad. I do not want our government to make it easier for American guns to cause tragedies either here or abroad.

We all should be making it HARDER, not easier, to export U.S. made weapons of war.

As of: November 29, 2018 **Tracking No.** 1k2-942m-5md2 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0468</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jean G. Cochran

General Comment

I oppose sales f arms to other countries. This simply escalates dangerous warfare and endangers peaceful people.

As of: November 29, 2018 **Tracking No.** 1k2-942m-dw5v **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0469</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: TAINA LITWAK

General Comment

I am very concerned. Right now, firearms exports are classified as military so they are under the regulation of the State Department. Congress can block sales of large batches of firearms to foreign countries. This is an important thing for the security of this country. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, or even counties who's real interests are not friendly towards the US.

Commerce Department just does NOT have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere like the State Dept. does. This means that it will become easier for firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents to obtain large caches of American guns and ammunition.

Please do not do this.

As of: November 29, 2018 **Tracking No.** 1k2-942m-p864 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0470</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Alexandra Sarason

General Comment

I oppose the rule change that brings regulation of firearms int'l sales away from US Dept of State to US Commerce Dept. Our international safety cannot afford opening sales of military arms to terrorist organizations which would happen if US Commerce Dept oversees the regulation.

As of: November 29, 2018 **Tracking No.** 1k2-942n-3r9o **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0471</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Darwin Busa

General Comment

It makes no sense to move export controls on military useful weapons from State to Commerce. I am totally opposed to this proposal.

As of: November 29, 2018 Tracking No. 1k2-942n-wmrp Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0472</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Connors

General Comment

The handling of export licenses of semiautomatic assault weapons and other powerful firearms must remain in the hands of the U.S. State Department for the security of our country. Trafficking in Arms would strengthen the enemies of the United States. Please fight to keep this control and not let it transfer to the U.S. Department of Commerce!

As of: November 29, 2018 **Tracking No.** 1k2-942n-m3c8 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0473</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kevin Kelly

General Comment

Don't listen to the NRA.

As of: November 29, 2018 **Tracking No.** 1k2-942n-jh11 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0474</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Firearms trafficking needs to stay under the State Department to control where the firearms go for the publics safety

As of: November 29, 2018 **Tracking No.** 1k2-942n-luh6 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0475</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: CJ Horner

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

WHAT THE HECK IS HAPPENING TO THIS COUNTRY????!!!!????????

Please, in the name of all that's holy, DO NOT DESTROY the carefully constructed structure that has been put in place to create protection for not only citizens of the USA, but for the world at large.

I beg this of you. I feel hope starting to die in me. Please reinstill my ability to hope for a better America and a better world.

As of: November 29, 2018 **Tracking No.** 1k2-942n-pujc **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0476</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

This is clearly not something that should be left up to any corporate interests, we need to keep firearm regulations in the state department.

As of: November 29, 2018 Tracking No. 1k2-942n-4mfb Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0477</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jonathan Holland

General Comment

I believe this change of authority is a poor move for America and I oppose it. Thank you for your consideration.

As of: November 29, 2018 **Tracking No.** 1k2-942n-198d **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0478</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Stuart Rubinow

General Comment

I oppose the proposed rule change that would switch the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. But these two departments have very different mandates: State to safeguard our nation, and Commerce to promote American businesses. Assault weapons should not be seen as just another product to be promoted, bought, and sold like washing machines or any other consumer product. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

As of: November 29, 2018 Tracking No. 1k2-942n-obm2 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0479</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Civitelli

General Comment

As of: November 29, 2018 Tracking No. 1k2-942n-ra4l Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0480</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Fosse

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

As of: November 29, 2018 Tracking No. 1k2-942o-k2sh Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

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Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0481</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Tiffany Hiranaka

General Comment

I am writing this comment in support of the this proposed rule. I feel that this proposed rule will be very beneficial to the U.S. I support this proposed rule for a few different reasons. I feel that if the ITAR and EAR imposes license requirements on exports and reexports, there will be a better handle of all items on the U.S. Munitions List (USML). Having a better handle on this situation could help to keep weapons and ammunition out of the hands of people who should not posses those items. This will also help the government to maintain the list of all individuals that holds a license, ensuring that applications are correctly completed, and the proper background checks are conducted prior to issuing the license. Another things that I support about this proposed rule is the requirements of Section 38(b)(1)(A)(ii). The requirements to this section will ensure that all business owners engaged in brokering activities are registered and licensed with the Arms Export Control Act (AECA). I feel that this is another benefit of the proposed revision because it ensure that all business are properly registered to conduct such brokering activities. I feel that this is important because our government will be able to closely maintain all business conducting such activities. This will ensure that these items dont get into the hands of groups or individuals that should not possess them.

I think that this rule will greatly impose on businesses and individuals If adopted. I think that businesses may feel that this is another way for government to charge them for something else. This in turn may cause businesses to shut down due to the costs being greater than the profits. Although this may cost people more, I feel that it would have a better regulation over all of the items on the USML that are imported and exported. This will also impact individuals who hunt for recreation purposes. This will make it a little more challenging for them to attain weapons and ammunition. Again, although these proposed change will affect business and individuals, I feel that the benefits outweighs the costs. Making this a rule that I feel should be passed, not to make things more difficult for people; but to ensure the safety of others.

As of: November 29, 2018 **Tracking No.** 1k2-942o-a1o5 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0482</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Marguerite Ritchie

General Comment

I oppose the change in rules in the regulation of exporting firearms from the U.S. State Dept. to the Dept. of Commerce. This would not allow Congress to be notified and block any shipment of large caches of firearms to be exported to foreign countries thus enabling dangerous entities such as terrorist groups, oranized crime and traffickers to prevail and is matter of national security.

The U.S. Dept. Of Commerce is ill equipped as it lacks the resources and field offices to take on such an endeavor of regulating large export of firearms from so many possible locations.

I feel it would be a mistake to change the current rules and accountability.

As of: November 29, 2018 Tracking No. 1k2-942o-gevb Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0483 Comment on DOS-2017-0046-0001

Submitter Information

Name: Vincent Ferri

General Comment

I am absolutely opposed to the proposed rule to transfer oversight of non-military firearm exports from the State Department to the Commerce Department. It is a transparent move to ensure windfall profits for the U.S. gun industry. The multi-year lobbying campaign by the NRA and National Shooting Sports Foundation to expand the reach and power of the gun industry will increase gun sales over 22% without the needed oversight by Congress to guarantee that these weapons do not find their way into the wrong hands.

Only the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. And, the conflict of interests posed by that transfer will pit NATIONAL SECURITY, IMMIGRATION STABILIZATION, AND THE MAINTENANCE OF DEMOCRACY AROUND THE WORLD AGAINST ARMS INDUSTRY CORPORATE PROFITS.

The U.S. Congress would voluntarily abdicate its Constitutionally mandated obligation to oversee commercial weapons sales of \$1 million or more.

However, I am in favor of the declassification of semiautomatic rifles as assault weapons, and support their classification as civilian products. As a combat veteran I am experienced enough in the classification and use of firearms to understand that a semi-automatic weapon is not an assault weapon and is most certainly not the kind of weapon I would use in a combat situation.

The AR15 series of semi-automatic rifles simply is not a battlefield weapon suitable for our troops in the field and because of that they are not the issued weapon for our combat troops in the field. By definition they are not assault weapons, and regulation of them because of the way they LOOK or how the unschooled public perceives them as "SCARY," is not a logical basis for regulation of these weapons separate from other semi-automatic rifles. These are not REAL categories; they are only excuses to make it appear that legislators are taking step in the direction of gun control.

There are clearly many important sensible and REAL gun control measures that would enhance public

Case 2:20-cv-00111-RAJ Document 106-24 Filed 09/23/20 Page 429 of 676

safety and curtail the number of mass shooting incidents. Waiting periods should be mandated to last as long as a thorough background check would take to complete, tight regulation of gun show sales, no gun ownership or license for those under 21 years of age, and full responsibility for any adult who allowed a minor 21 years of age or younger to have access to a firearm of any kind are all measures that should be adopted.

Te AR15 series of semi-automatic rifles have been used by criminals and people with psycho-social disease to kill innocent children and our loved ones, but the facts are that these criminals will use whatever weapon is available, as in the most recent devastating shooting incident in Annapolis. In almost every case of mass shooting in the United States and other countries, the threat posed by the criminal perpetrators were well documented, and the failures of responsible authorities are clearly evident. Those authorities must be held criminally accountable for their failings.

The State Department is the only agency that should be responsible for international sales [as defined in the current controlling laws] and relative to international sales MUST remain the controlling agency. Further, the potential National Security threat from international firearms sales that have no serious oversight, as would be the case if the Commerce Department were to assume this role, absolutely requires Congressional oversight and Congress must exercise its power and responsibility as an important element of our Constitutionally mandated system of Checks and Balances.

Important references:

Trump move would make it easier for U.S. gun manufacturers to export firearms, https://action.momsrising.org/go/38291?t=13&akid=11002%2E2524772%2E0kwGD5 The Washington Times, May 14, 2018.

Trump wants to make foreign arms sales easier, https://action.momsrising.org/go/38292?t=14&akid=11002%2E2524772%2E0kwGD5 The Boston Globe, June 23, 2018.

American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, https://action.momsrising.org/go/38293?t=15&akid=11002%2E2524772%2E0kwGD5 The Trace, May 25, 2017.

The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, http://action.momsrising.org/go/38294?t=16&akid=11002% 2E2524772%2E0kwGD5 Violence Policy Center.

As of: November 29, 2018 **Tracking No.** 1k2-942o-zu4c **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0484</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Sandra Van Sant

Organization: Jeff Galloway Training - Jersey Shore

General Comment

I oppose the proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I believe it is merely another attempt by the NRA to bypass our protection of national security.

As of: November 29, 2018 Tracking No. 1k2-942o-b3nt Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0485</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: jeffery anderson

General Comment

THIS would be the wrong move changing the classifaction of firearms to anything other than MILITARY.IT would no longer to be able to regulate sales of large shipments of firearms to persons and military in foreign countries from the UNITED STATES. firearms need to be regulated for the safety of american citizens and our countries security, thank you mr anderson

As of: November 29, 2018 Tracking No. 1k2-942o-1ybo Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0486</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: anonymous Anonymous

General Comment

I am a concerned American and Connecticut citizen.

As of: November 29, 2018 Tracking No. 1k2-942o-n21e Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0487 Comment on DOS-2017-0046-0001

Submitter Information

Name: Carla Lilley

General Comment

I oppose shifting the sale of arms from the State Department to Commerce. We do not need to Arm The World any more than we already have. It is 2018 and it is time to wean ourselves away from debilitating Wars. It will most certainly come back to bite us from a military and national security perspective.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking. More trafficking will most certainly Increase the refugee/immigration debacle we are currently experiencing as families try to escape violence in Central America. It will increase mass migration all over the Planet Earth. It will increae our debt to the point of national collapse. What then?

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Increasing the sale of weapons around the world will endanger the people of the United States. Is more money for gun manufacturers worth that? We will be the most hated country in the world if we do this. We have enough war in this world. It is time to limit the sale of weapons and work for Peace and Stability. It is time to use our brains and find alternative solutions instead of feeding the Corrupt War Machine. Stop the killing, stop the daying, stop the worldwide suffering of refugees.

Shame On All of You for even considering this. Carla Lilley, Pittsboro, NC

As of: November 29, 2018 **Tracking No.** 1k2-942o-533y **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0488</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Elissa Wagner

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-942p-gah8 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0489</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Peter van Dorsten

General Comment

As of: November 29, 2018 Tracking No. 1k2-942p-hlnm Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0490</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Paul Johnson

General Comment

As of: November 29, 2018 Tracking No. 1k2-942p-q05h Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0491</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Doug Peltonen

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-942p-s3me **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

 $I,\, II,\, and\,\, III$

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0492</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kate Hermann-Wu

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-942p-9ixh **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0493</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: michael tucker

General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5] It would remove licensing requirements for brokers, increasing the risk of trafficking.[6] It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

As of: November 29, 2018 **Tracking No.** 1k2-942p-a9x2 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0494</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Shawn Sapp

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

As of: November 29, 2018 Tracking No. 1k2-942p-anxq Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0495</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: frank belcastro

General Comment

As of: November 29, 2018 Tracking No. 1k2-942p-nwjh Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0496</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change; it will make the nation less safe.

As of: November 29, 2018 **Tracking No.** 1k2-942p-9m0j **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

 $I,\, II,\, and\,\, III$

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0497</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Donna Knipp

General Comment

As of: November 29, 2018 Tracking No. 1k2-942p-dfve Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0498</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Gail Kennedy

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-942p-ek5l **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0499</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: don r

General Comment

YES, MAKE IT EASIER TO KILL PEOPLE, TRUMP IS PULLING YOU FOOLS AROUND BY THE NOSE! COWARDS

As of: November 29, 2018 **Tracking No.** 1k2-942p-cxkd **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0500</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Molly Swabb

General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5] It would remove licensing requirements for brokers, increasing the risk of trafficking.[6] It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

As of: November 29, 2018 Tracking No. 1k2-942p-1wzx Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0501</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Deborah Garber

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

As of: November 29, 2018 Tracking No. 1k2-942p-vbnq Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0502</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anna Franz

General Comment

Please keep gun exports under the State Department. Enough of our weapons wind up in enemy hands as it is.

As of: November 29, 2018 Tracking No. 1k2-942p-ohng Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0503</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: A. B.

General Comment

STOP SERVICING PUTINS FUNDED nra traitors. Wth is wrong with you. Serving PUTINS lapdog and his menagerie of traitors. Embedded infesting our government.

As of: November 29, 2018 Tracking No. 1k2-942p-uy9x Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0504</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Alyssa Melton

General Comment

Case 2:20-cv-00111-RAJ Document 106-24 Filed 09/23/20 Page 451 of 676

Message

From: Khawam, Joseph N [KhawamJN@state.gov]

Sent: 12/31/2019 8:56:05 PM

To: PM-Staffers Mailbox [PM-StaffersMailbox@state.gov]; Windecker, Melissa A [WindeckerMA@state.gov]

Subject: Cats I-III AM - Large Files - Tab 3 Attachment 5

Attachments: Tab 3 Att 5a - Public Comments to the Department of State Proposed Rule.pdf; Tab 3 Att 5b - Public Comments to

the Department of State Proposed Rule.pdf

I'm not sure what the maximum limit is on emails, so I'm breaking Tab 3 Attachment 5 into five emails.

Email 1 of 5

Joseph N. Khawam Attorney-Adviser U.S. Department of State Office of the Legal Adviser (L/PM) 2201 C Street NW, Suite 6420 Washington, DC 20520 (202) 647-8546 (T, W, T) (202) 663-2915 (M) (202) 663-3097 (F)

Opennet: KhawamJN@state.gov

As of: November 29, 2018 **Tracking No.** 1k2-93f9-oql0 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0002</u> Comment on DOS FRDOC 0001-4527

Submitter Information

Name: Anonymous Anonymous

General Comment

I fully support the US State Department's proposal to amend the International Traffic in Arms Regulations (ITAR) to revise Categories I (firearms, close assault weapons and combat shotguns), II (guns and armament) and III (ammunition and ordnance) of the U.S. Munitions List (USML) to describe more precisely the articles warranting export and temporary import control on the USML. Items removed from the USML would become subject to the Export Administration Regulations (EAR).

This improvement to US regulations will help legitimate commerce and to help the competitiveness of American companies in international trade.

Thank you for the opportunity to support this important change to Federal regulations.

As of: November 29, 2018 Tracking No. 1k2-93d5-doam Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0003</u> Comment on DOS FRDOC 0001-4527

Submitter Information

Name: Merlin Larsen

General Comment

I am responding as a life member of the NRA, at the behest of an NRA-ILA email alert to do so. I am in complete agreement that these changes to the economic strictures on guns and components, that are of civilian application and use, are necessary and should be done. Loosened or eased commercial regulations on US gun manufacturers and the components thereof, will make the US economy improve by being more competitive internationally. Meanwhile, the strictly military weapons and components will remain highly regulated (scrutinized), as they should be.

As of: November 29, 2018 **Tracking No.** 1k2-93cr-lr9s **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0004</u> Comment on DOS FRDOC 0001-4527

Submitter Information

Name: Jonathan Sawyer

General Comment

As an American citizen I urge you to carry through with this change. It will take a large burden off of the small businesses and allow them to build the American dream they set out for years ago. Thank you for your consideration

As of: November 29, 2018 Tracking No. 1k2-93h6-hc5l Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0005</u> Comment on DOS FRDOC 0001-4527

Submitter Information

Name: James Morris

General Comment

I agree with the elimination of the annual \$2,250 fee required by the Department of States Directorate of Defense Trade Control (DDTC), which the Obama administration imposed on gunsmiths who manufacture firearms and ammunition. That fee unfairly targeted and disadvantaged Small Businesses manufacturing a few firearms per year. Small businesses that manufacture approximately 25 firearms a year, such as custom gun builders, would have to recover the ITAR fee by increasing the cost of each weapon by nearly \$100. This makes it nearly impossible for small business that manufacture firearms to compete against the prices of larger businesses that can recover the \$2,250 fee over hundreds or thousands of firearms.

As of: November 29, 2018 **Tracking No.** 1k2-93ea-6g13 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0006</u> Comment on DOS FRDOC 0001-4527

Submitter Information

Name: joe plano

General Comment

Why is there not a section that REPEALS the terrible practice of engraving imported firearms into the USA with the importers name on the side of the firearm?

This Damages the firearm immediately, immediately makes the firearm less valuable, and is completely and utterly pointless for any other reason that " this is how we have always done it ".

Lets change some IMPORT LAWS as well here so that valuable, collectible firearms are not defaced by ridiculous government regulations.

As of: November 29, 2018 Tracking No. 1k2-93ds-xzss Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0007</u> Comment on DOS FRDOC 0001-4527

Submitter Information

Name: Karl Lippard

Organization: People of the United States

Government Agency Type: Local Government Agency: none

General Comment

ITAR in its present form is TREASON against the American public and 2nd Amendment. ITAR circumvents Federal Law pursuant to License of manufacture, distribution and exportation of any and all components. Such Licenses hold that interpretation of the law rests with the license holder. State and Federal Government only enforce the law. First National Gunbanque, Corp vs Bomar Corp., Federal Court Gainsville, GA circa 2003 where this statement was upheld in the 12 page decision....Further ITAR presumes to offer a assigned number only by which one can do business. It has no examiner known, can issue or withhold at will without benefit of law or reason. It can without any supervision, or regulation deny ALL public access to arms, ammunition, components or parts for firearms. This in violation of the 2nd amendment where among other things guarantees our right to take back a government where tyranny has come to exist....Tyranny does exist today in America at the highest level of government. A government created to insure disarmament of it citizens by control of its arms and ammunition. It allows the open invasion of people through our boarders. It allows through ITAR foreign control of our ability to defend ourselves and those of our allies. It is a fraud on the American people....Additionally it states to charge an annual fee that covers ALL CITIZENS THAT MANUFACTURE ALL GOODS TO PAY THIS ANNUAL FEE OF \$2,500.00, PLUS \$250.00 FEE PER CONTRACT, PART OR SHIPMENT. THIS IS UNLAWFUL TAXATION WITHOUT REPRESENTATION....Therefore let it be known that this is TREASON against the American people. We call on our president to reject, dismantle or correct this Obama inspired act. If not this single regulation; is an act of WAR on the American people. I call for a Constitutional Convention. If not a state of war will exist among the People of the United States until rectified.

As of: November 29, 2018 Tracking No. 1k2-93gd-t93o Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0008</u> Comment on DOS FRDOC 0001-4527

Submitter Information

Name: Judy Mouradian

General Comment

I am appalled that this administration is proposing that responsibility for overseas gun sales move from the State Department to the Commerce Department. There is only one purpose for this - to ease restrictions on overseas gun sales - helping U.S. gun manufacturers to sell more guns. The outcome would be catastrophic. These guns would be sold to the very countries that already breed violent drug gangs, causing their citizens to flee to the U.S. Do we really want to spread the gun violence that is happening in our country to other countries? Do we want to create more deaths and drug trafficking? Do we want to create more homeless refugees? This is a lose-lose situation for everyone except gun manufacturers and the NRA. Please stop this horrible proposal!

As of: November 29, 2018 **Tracking No.** 1k2-93cv-6cds **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0009</u> Comment on DOS FRDOC 0001-4527

Submitter Information

Name: Thomas Goodwin

General Comment

Currently, many small firearms companies have many regulations stacked against them. Even some funsmithing is pushing gunsmiths into a munufacturer category. This is just one of the many problems that could be changed with this proposed rule. It's time we reclassified many of these items and services to remove them from the ITAR and USML and place them on the CCL. Free up the market for our small companies and let the industry thrive.

As of: November 29, 2018 Tracking No. 1k2-93fr-qr1f Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0010</u> Comment on DOS FRDOC 0001-4527

Submitter Information

Name: Allan Haley

General Comment

President Trumps New Proposal for easing restrictions on overseas gun sales is counter the well-being of American citizens. It would accelerate gun sales to Mexican and Central American violent gangs creating more violence in these countries. This would spur more immigration to the US. In addition, along with increased drug gang power would come more illegal drugs flowing into the US.

This proposal is a bad idea.

As of: November 29, 2018 **Tracking No.** 1k2-93d3-7n96 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0011</u> Comment on DOS FRDOC 0001-4527

Submitter Information

Name: Clem MacIlravie

General Comment

Proceed.

As of: November 29, 2018 Tracking No. 1k2-93d1-6eqx Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0012 Comment on DOS FRDOC 0001-4527

Submitter Information

Name: M. Anonymous

General Comment

This looks like a good, common sense, fiscally advantageous move. I look forward to these changes being implemented.

As of: November 29, 2018 Tracking No. 1k2-93eg-e1qw Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0013</u> Comment on DOS FRDOC 0001-4527

Submitter Information

Name: Ron Gablehouse

General Comment

Repeal the requirement that individuals traveling abroad with firearms strictly for hunting or competition must document the export of their firearms through an official website designed for commercial exports.

Remove sound suppressors from the USML.

As of: November 29, 2018 Tracking No. 1k2-93en-34au Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0014</u> Comment on DOS FRDOC 0001-4527

Submitter Information

Name: David Brach

General Comment

These new proposed rules are a good start, but please make it easier for people to travel abroad with weapons for hunting or competition. Also, please make it easier on suppressor manufacturers by changing them to non military.

As of: November 29, 2018 Tracking No. 1k2-93dp-2ye9 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0015</u> Comment on DOS FRDOC 0001-4527

Submitter Information

Name: Andrew Bourdon

General Comment

In regards to Docket DOS-2017-0046 (ITAR AmendmentCategories I, II, and III):

I support the proposed rule change. It will simplify the regulatory process by removing certain firearms that are not inherently "military grade" from the list. That will enable ITAR enforcement to be more streamlined- regulators can then focus on "real" military small arms and less on civilian friendly guns. Industry will benefit, as manufacturers and consumers will have more options in the marketplace.

As of: November 29, 2018 Tracking No. 1k2-93fq-fjy2 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0016</u> Comment on DOS_FRDOC_0001-4527

Submitter Information

Name: Anonymous Anonymous

General Comment

I would like to comment on the license fees that are currently imposed on very small businesses such as Gunsmiths and micro manufacturers of firearms components. I am not against a fee but the fee should be adjusted based on company earnings in excess of \$500,000.00 any business that falls below this figure should be permitted to purchase a yearly export/import license for less then \$500.00. Currently the BATF has adjusted license fees for the various types of FFL's issued, ITAR fees could be based on the license fees that are charged by the BATF for that businesses Type FFL. In addition perhaps a check box could be added to the renewal application of an FFL that would allow the business owner the option to purchase an Import/Export license for their business at the time of application or renewal. The option to include the Import/Export license could also be extended to the Special Occupation Tax or SOT/NFA and be based on the same fee that the BATF charges for this special Tax.

Thank you for the opportunity.

As of: November 29, 2018 Tracking No. 1k2-93fr-itxu Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0017 Comment on DOS_FRDOC_0001-4527

Submitter Information

Name: Ted Ruetenik

General Comment

The proposal to move the responsibility for overseas gun sales from the State Department to the Commerce Department is a bad idea. Stopping guns, especially assault weapons, from getting into the wrong hands should be a top priority. Immigration to this country is already spurred on by violent drug gangs in Central America. Easing the sale of more weapons will only further the immigration and drug problems. The guns could also be used against American soldiers in future combat situations.

There is only one goal of this proposal. That is, to help the gun companies sell more guns. The potential overall costs of expanded violence and illegal immigration have not been considered. The lack of a moral compass should bother anyone involved with this issue.

As of: November 29, 2018 **Tracking No.** 1k2-93d4-cl9q **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0018 Comment on DOS FRDOC 0001-4527

Submitter Information

Name: Doug Collins

General Comment

Anything we can do to strengthen American small business and make us more competitive on a global market are rules we need to enact now.

As of: November 29, 2018 **Tracking No.** 1k2-93hm-6j6c **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0019 Comment on DOS_FRDOC_0001-4527

Submitter Information

Name: Jim Ruetenik

General Comment

Guns are a national security risk and should be managed by the State Department.

As of: November 29, 2018 Tracking No. 1k2-93eg-mik9 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0020</u> Comment on DOS FRDOC 0001-4527

Submitter Information

Name: Ron Gablehouse

General Comment

Please also remove sound suppressors from the USML

As of: November 29, 2018 Tracking No. 1k2-93fa-nitu Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0021</u> Comment on DOS FRDOC 0001-4527

Submitter Information

Name: WILLIAM HANGEN

General Comment

I support the proposed rule as written, but with a few minor changes:

- 1) the referenced magazine capacity restriction of 50 rounds should be doubled, to 100 rounds. There are several magazine manufacturers in the United States producing magazines of greater than 50 rounds that would benefit from this change, and such manufacture and enabling technology for magazines greater than 50 rounds is found worldwide. Limiting this magazine capacity to 50 rounds does not protect any special US or allied military advantage, but magazines of greater than 50 rounds are commonly found worldwide. Drum type magazines for the Kalashnikov family of weapons are a prime example.
- 2) the proposed rule does not address sound suppressors. Sound suppressors are readily available in the US and overseas, and the technical know-how to produce them is found worldwide. There are a plethora of US manufacturers fabricating sound suppressors that would benefit from this rule change, and the use of sound suppressors does not confer any special US or allied military advantage. Inclusion of sound suppressor deregulation would benefit US manufacturing interests without harming our military position.

Thank you for your time and attention regarding this matter. Have a great day!

As of: November 29, 2018 Tracking No. 1k2-93f0-nv6d Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0022</u> Comment on DOS FRDOC 0001-4527

Submitter Information

Name: stephen wisher

General Comment

I feel that regulation of international travel with firearms should be moved to the CCL for more ease of hunting travel. Also we should reduce regulation of sound suppressors to preserve the hearing of hunters and sport shooters, so move this control to the CCL as well.

As of: November 29, 2018 **Tracking No.** 1k2-93j9-93yk **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0023</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us.

As of: November 29, 2018 Tracking No. 1k2-93j9-1si8 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0024</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Evans

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-93j9-9isg **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0025</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jodi Paulsen

General Comment

As of: November 29, 2018 Tracking No. 1k2-93j9-olnr Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0026</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Do not remove important export controls on non-military firearms, including handguns, semiautomatic assault rifles like the AR-15, and .50-caliber sniper rifles from your control. This change could (open) up a lot more risk and a lot more opportunity for illegal and illicit trafficking. A loosening of controls may also make it harder to identify and prosecute arms smugglers and illegal exporters.

The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more. The rule would seek to legitimize semiautomatic assault rifles as civilian products when they are, clearly, battlefield weapons.

This makes no sense at all. I object!

As of: November 29, 2018 **Tracking No.** 1k2-93j9-ghzx **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0027</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

As of: November 29, 2018 Tracking No. 1k2-93j9-coqe Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0028</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Erik Hanson

General Comment

As of: November 29, 2018 Tracking No. 1k2-93j9-lmf5 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0029</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-93j9-r5ka **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0030</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

As of: November 29, 2018 Tracking No. 1k2-93j9-bscr Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0031</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jeffrey Egerton

General Comment

As of: November 29, 2018 Tracking No. 1k2-93j9-u6kj Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0032</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Suzanne Kelly

General Comment

As of: November 29, 2018 Tracking No. 1k2-93ja-wnuo Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0033</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Faith Scimone

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-93ja-vsqu **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0034</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I would like to offer my comment in absolute opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. To me, this rule has profits for gun industry written all over it. Perhaps thats because the U.S. gun manufacturers are not doing well domestically. NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen the lives of so many of our fellow Americans. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

As of: November 29, 2018 Tracking No. 1k2-93ja-walm Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0035</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Becky Balser

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-93jb-7xmo **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0036</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Angel Marks

General Comment

As of: November 29, 2018 Tracking No. 1k2-93jb-9624 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0037</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Ken Koupal

General Comment

Please don't export arms and ammunition. Don't supply terrorists, foreign or domestic.

As of: November 29, 2018 Tracking No. 1k2-93jb-xsm8 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: <u>DOS-2017-0046-0001</u>

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0038</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

As of: November 29, 2018 Tracking No. 1k2-93jd-zmhz Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0039</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is against the interests of U.S. diplomacy.

As of: November 29, 2018 **Tracking No.** 1k2-93jg-u6yo **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0040</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Cabell

General Comment

I am writing to submit my comment in opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry to offset reductions in domestic sales It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change; it has not been supported by an citizen groups. It would make U.S. exports of small arms far more dangerous, Transferring oversight responsibilities to an agency that prioritizes business over national security would make U.S. exports of small arms, including semi-automatic weapons, very dangerous to other countries of the world. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which represents an unfortunate loss of oversight. I also find the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us to be appalling. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally.

As of: November 29, 2018 Tracking No. 1k2-93jt-olpo Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0041</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Deborah Lattimer

General Comment

As of: November 29, 2018 Tracking No. 1k2-93ju-wspl Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0042</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: TONI REH

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-93jv-v68k **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0043</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-93jv-p10o **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0044</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Do NOT do this. How do you all live with yourselves?

As of: November 29, 2018 Tracking No. 1k2-93jx-cjn1 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0045</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Sherrie Anonymous

General Comment

As of: November 29, 2018 Tracking No. 1k2-93jy-6071 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0046</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Lisa McElroy

General Comment

I strongly oppose the proposed rule to transfer oversight of "non-military" firearms exports from the State Department to the Commerce Department. This proposal benefits the gun lobby and has come about after years of lobbying by the NRA and the NSSF. By transferring oversight responsibilities to an agency that prioritizes business over national security, this proposal would make U.S. exports of small arms more dangerous. Congress would lose its ability to oversee commercial weapons sales of \$1 million or more, This rule would also legitimize semiautomatic assault rifles, labeling them "civilian" products when these battlefield weapons have taken so many loved ones--innocent people at school, at church, at the movies, in a nightclub. This proposed rule is only in place to garner profits for the U.S. gun industry overseas--a cynical money grab that would be deadly for innocent people. Do the right thing--say no to this proposal and protect lives.

As of: November 29, 2018 **Tracking No.** 1k2-93k1-j4xq **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0047</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Angel Marks

General Comment

As of: November 29, 2018 **Tracking No.** 1k2-93kc-cnwj **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0048</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Mark Bischoff

General Comment

Adjust the requirement for private individuals to travel abroad with personally owned firearms for lawful purposes such as hunting or competition. Eliminate, or provide for a citizen friendly option, to travel abroad with a firearm. The documentation of the export through the official website designed for commercial exporters is not citizen friendly. An individual traveling for a hunting trip or competition should not be regulated as an exporter.

Sound suppressors or silencers are very common among hunters and recreational shooters both in the U.S. and abroad. They do not provide the U.S. or its allies with any special military advantage. Sound suppressors and silencers should be removed from the USML.

As of: November 29, 2018 Tracking No. 1k2-93l6-fdi1 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0049</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Patrick Hiller

General Comment

Dear Ladies and Gentlemen,

I oppose the proposed rule for the following reasons:

- 1. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. Regarding wide retail availability of firearms, about which comment has been requested, many countries, including Mexico, prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles.
- 2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.
- 3. National brokering laws are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. The switch from State to Commerce will mean that the brokers and financiers who arrange shipments of semiautomatic firearms will no longer have a statutory requirement to register and obtain a license, increasing risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.
- 4. The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators.
- 5. End-use controls are weakened by eliminating registration of firearms exporters, a requirement since the 1940s.
- 6. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those

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weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

7. The Commerce Department does not have resources to enforce export controls, even before the addition of 30,000 firearms export licenses as a result of this rule predicted by Commerce. The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

- 8. The proposed change will reduce transparency and reporting on gun exports.
- 9. This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.
- 10. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

As of: November 29, 2018 **Tracking No.** 1k2-93lc-ez3v **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0050</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Cynthia Tuthill

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is truly horrifying. Im also opposed to the rules attempts to legitimize semiautomatic assault rifles as civilian products, when these battlefield weapons have stolen so many of our loved ones from us. Your agency must not approve this blatant corporate giveaway.

As of: November 29, 2018 Tracking No. 1k2-93ls-9mwm Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0051</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Virginia Kenyon

General Comment

My name is Virginia Kenyon and I am a member of the Palo Alto Friends (Quaker) Meeting here in California. Within each of us there is an inner light and guide for how to live in the world. As Americans I believe we still have the ability to brighten the Light within for people everywhere, but these changes will do the opposite. Stop. Listen to your heart. Let everyone's Light shine.

Reasons for opposition:

The proposed rule would eliminate Congressional oversight for important gun export deals. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The switch from State to Commerce will mean that the brokers and financiers who arrange shipments of semiautomatic firearms will no longer have a statutory requirement to register and obtain a license, increasing risk of trafficking. That will make it easier for unscrupulous dealers to escape attention. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations,

End-use controls are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

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The Commerce Department does not have resources to enforce export controls. The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance. Commerce does not have these resources.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. [ii] The export of these weapons should be subject to more controls, not less.

As of: November 29, 2018 **Tracking No.** 1k2-93md-xlkq **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0052</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Hugh Fike

General Comment

I support the elimination of the annual \$2,250 fee required by the Department of States Directorate of Defense Trade Control (DDTC). When the Obama Administration imposed this requirement on gunsmiths who manufacture firearms and ammunition, it was done so in an attempt to drive out of business those smaller manufacturers. Additionally, this decision could capture those who are simply threading a barrel or blueprinting a gun. As a supposed pro-gun administration, I'm asking that you stand up for firearms manufacturers.

As of: November 29, 2018 **Tracking No.** 1k2-93me-nman **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0053</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Walter Bunyea

General Comment

An annual registration fee, of \$2,250, that manufacturers of defense items must pay, whether or not they export their products is simply unjustifiable. Please end this bad practice as soon as you can.

Applying the regime to private travelers/hunters is, well, bizarre. So please end this practice as well.

Finally, and most importantly, please put an end to any harassing or censorship of firearm instructors within the U.S, bloggers, writers, and those posting online guides or tutorials discussing "technical data" about defense items. This seems to be a clear violation of our First Amendment right to free speech. So, I urge you to cease these activities immediately.

Our Government should be protecting our rights at home and abroad, not impinging upon them.

Thank you for your consideration of our basic liberties.

As of: November 29, 2018 **Tracking No.** 1k2-93me-uxvg **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0054</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: David Hawley

Organization: Precision Decisions

General Comment

This is a common sense solution. Removing gunsmiths from ITAR regulation is the only sensible answer. Gunsmiths should be allowed to perform any legal action/modification requested by a customer without having to pay fees that can exceed their profit margins in a cottage industry.

As of: November 29, 2018 Tracking No. 1k2-93mi-1356 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0055</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: lynn barrow

General Comment

I am in full agreemant with the proposed changes to ITAR. It has negatively impacted my business and forced me to withdraw my application for a Class 7 license within the last 6 months. I also would like to see suppressors moved from under current class 3 regulation.

As of: November 29, 2018 Tracking No. 1k2-93mj-nfr2 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

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Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0056</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: William Guiette

General Comment

I am a small business owner, and have been a licensed firearms manufacturer for 30 years, with a special tax stamp to add Title 2 firearms (fully-automatic-"MG's"-). For 25 of those years I was licensed to manufacturer "Destructive Devices" (DD's-firearms/guns over .50 caliber including fully automatic types as well as artillery). My MG and DD manufacturing activities have always been directed at motion picture use. In order to accomplish this, I usually purchased MG or DD Parts Kits, and then manufactured the "Receiver" (the serial numbered part which is considered, by itself, to be the "Firearm"). In this way, I put together guns representing almost every country that made MG's from the 1880's to the 1980"s. Many of these guns are belt-fed, and almost all of them utilize 250-rd. belts. All were used in major motion pictures over the years.

The ITAR treaty has always created a hardship for me when I had to send in \$2,250 every year just to renew my registration as a manufacturer of the above. This is supposedly a pre-condition for obtaining an export license, which is something I have never done. Any exporting of my guns for motion pictures was done by brokers (who had their own license) hired by the production companies. If the proposed ITAR revisions are going to remove my registration requirement, then I applaud that Big-time!

However, I also want to see the proposed magazine capacity limit of 50 rds. to go away, or be raised to 250 rds. This will alleviate a BIG issue which will arise over the 250-rd. belts I mentioned earlier. Motion pictures are a form of escapism, where the audience can "be there"; and producers and directors should be allowed to have available the correct props for the occasion.

William E. Guiette

As of: November 29, 2018 Tracking No. 1k2-93mk-oge8 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0057</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Theodore Greene

General Comment

I fully support lessening the regulatory burden on firearms manufacturers, wholesalers, retailers and other firearms support businesses (e.g., parts manufacturers, parts suppliers, parts sellers, gunsmiths, etc.) who are not involved in the international firearms business. National, State, and local businesses should not be burdened with the financial costs of unnecessary licenses, or the aditional regulatory and legal restrictions that apply to those who do business internationally rather than domestically. Furthermore, even international bsuinesses should have their legal and regulatory burdened lightened if doing so will facilitate American enterprise.

As of: November 29, 2018 Tracking No. 1k2-93n3-jrww Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0058</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Henry Blake

General Comment

The United States does not suffer from the risk of small arms attack by an outside entity at this time. The release of this technology to the world will not threaten this country. Our business's need to be able to compete with the existing trade in arms without government restriction. Doing so will keep us on the advance edge of arms development. Please reduce this regulation to the greatest extent possible. Thank you,

HLB

As of: November 29, 2018 Tracking No. 1k2-93n9-udir Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0059</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

The current rules have had a negative impact on my business for the last five years.

As a independent gunsmith I was required to be licensed as a manufacturer in order to perform certain repairs for customers.

As a licensed manufacturer I came under the U.S. State Department. Since I do not export or do work for foreign governments and simply cannot afford the \$2200.00 annual licensing fee I have not engaged in the repairs that are considered manufacturing.

The US State Department's proposal to amend the International Traffic in Arms Regulations is a step in the right direction.

I would like to see a better clarification and distinction between "manufacturer" and "gunsmith."

As of: November 29, 2018 Tracking No. 1k2-93nd-25ak Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0060</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Ed Weber

General Comment

Eliminating the annual \$2,250 fee required by the Department of States Directorate of Defense Trade Control (DDTC) should be approved. It makes no sense to impose this fee on U.S. gunsmiths who manufacture firearms and ammunition as small businesses.

As of: November 29, 2018 **Tracking No.** 1k2-93nd-1f31 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0061</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Raymond Crawford

General Comment

These regulations as currently applied cast a broad net that results in many small companies that do not export anything being forced to pay a significant sum of money to an agency that should have no oversight over domestic production of commercial firearms and firearms-related items. From the perspective of people in the firearms and gunsmithing business, this is an unabashed power and money grab by a huge agency with unlimited resources to crush any small company that does not comply with these regulations as State Department has decided to interpret them. Large corporations could not care less about more regulations and "fees" being imposed on them, they have deep pockets and armies of compliance professionals. Small businesses do care greatly. Profit margins for many of these small shops are meager to begin with. Once it was announced that very burdensome fees were going to be imposed, many businesses closed. It was not worth the hassle and expense anymore. If the aim of these regulations is to drive small companies out of business leaving only the big fish, this is being brilliantly executed. Please apply some justice and logic to these regulations. Do not demand fees from companies that do not export as they should be outside State Department's purview.

Thanks,

Raymond Crawford

As of: November 29, 2018 Tracking No. 1k2-93ns-11r8 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0062</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Daniel Youkilis

General Comment

As a close relative of someone murdered by an AR-15, I know that semi-automatic assault rifles have no civilian purpose. This proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. These are weapons of war and their only civilian purpose is carnage. They must not be transferred to the Commerce Department control where they would not be given proper oversight.

As of: November 29, 2018 **Tracking No.** 1k2-93nu-ytb9 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0063</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Logan Ward

General Comment

When I look at the ITAR regulations, I feel most of these regulations are unnecessary.

As of: November 29, 2018 Tracking No. 1k2-93os-2se8 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0064</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Im 60 years old and semi-retired. I operated a gunsmith shop in my early twenties but gave it up to better support my family. However, I always intended to go back to gunsmithing later in life. Finally that happened, I spent quite a bit of money that would have funded my retirement starting my business. I had a new building built, I bought and learned to use 3 manual lathes and a mill with the intention of getting a manufacturers FFL and making a few custom firearms a year, restoring and selling a few older firearms a year and doing general repairs. I figured I would make \$5000 to \$10,000 a year to supplement my retirement while doing a job my community needed. I probably spent \$85,000 or so on my building, equipment and tools.

However, the Obama administration changed the interpretation of the ITAR rules and started requiring holders of FFL-07 licenses (manufacturing FFL) to send nearly \$3000 per year to the state department in ITAR fees. This could well have been half or more of my yearly profits and meant I had to settle for a type 01 FFL and be a gunsmith only. At that time, as a gunsmith I could do nearly any repair, customization or improvement for a customer on his/her firearm but could not improve, customize or refinish a firearm and then sell it as that would make me a manufacturer. Although this wasnt the future Id worked towards for nearly 40 years, it was better than nothing.

Then, in July of 2016 the Obama administration again reinterpreted the existing rules and decided to bring virtually all the jobs gunsmiths do under the ITAR umbrella. This was obviously intended to bankrupt the nations gunsmiths, and, I suspect to chill pre-election free speech. It did not suppress my free speech but it did cause me to start turning away 90% of my potential customers. Under these rules refinishing firearms and replacing parts is about the only thing a gunsmith is now allowed to do. According to the 2nd Obama reinterpretation of the ITAR rules even making a screw or stock for a 150 year-old firearm could be interpreted as a violation.

Since these rules took effect in July of 2016 I dont believe I have made a monthly profit, even once. Threading barrels, customizing, making stocks, dovetailing sight groves, re-chambering, making obsolete parts and the like are all still banned to my knowledge. And, with the exception of the occasional

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machine shop work, my three lathes and my mill are still idle.

I am again considering closing my shop because of this. My insurance alone is nearly a grand a year and Im not sure how long I can survive while waiting on this to be fixed. Please, lets get the State Department out of the gunsmith business and again allow a gunsmith to make and sell a few custom firearms a year without being bankrupted by ITAR.

As of: November 29, 2018 Tracking No. 1k2-93p7-gxey Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0065</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Brad Krug

General Comment

Please reverse Obama's Executive order that makes small home based gunsmithing activities subject to the registration and tax payment of at least \$1250 per year for activities as minimal as making a small spring. It was a last minute decision by Obama to put an un-affordable burden, defined as a tax on small business.

This order was unfair and unnecessary, and another overstep of authority by an anti-2nd amendment President.

Thank You

As of: November 29, 2018 Tracking No. 1k2-93pn-lpfq Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0066</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Paul Washart

General Comment

I oppose the proposed rule on gun exports because. Proposed rule treats semi-automatic assault rifles as non-military But US troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles & handguns, as well as of any larger caliber firearm. Many semi-automatic rifles are also easily converted to fully automatic. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate export of arms & would eliminate Congressional oversight for gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons which limits its ability to comment on related human rights concerns, as it recently did on the Philippines & Turkey. Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. In a September 15, 2017, letter, Senators Ben Cardin, Dianne Feinstein, & Pat Leahy explicitly noted that this move would violate Congressional intent & effectively eliminate Congress proper role. New rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the taxpayers will absorb the cost of reviewing applications and processing licenses not the gun exporters that benefit from these sales. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons, firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.

Rule would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. Transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database,

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weakening enforcement against arms trafficking.

Rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. Unless corrected, the new regulations run the risk of effectively enabling 3D printing of firearms in US & globally. By eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could he State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources. Proposed change will reduce transparency and reporting on gun exports by eiminating Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency Commerce Department - whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. Export of these weapons should be subject to more controls, not less.

As of: November 29, 2018 Tracking No. 1k2-93pp-8ngt Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0067</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: nan logan

General Comment

I am concerned that international gun sales might be proscessed through commerc rather than State. Please do what you an to keep these sales under the State Department's perview.

As of: November 29, 2018 **Tracking No.** 1k2-93pq-gj42 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0068</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Heidi Fox

General Comment

I am in strong opposition to the proposed changes in the rules for international trafficking of arms. I was alerted to this proposed rule change by organizations who advocate for sensible gun control legislation domestically. Until we can agree on the definition and categorization of weapons designed for mass destruction and control their production and use domestically, we should not be modifying rules for the oversight of arms manufactured and distributed internationally. These rule changes are one of many ways that ordinary citizens who advocate for broader and stricter gun control are undermined by special interests who know where to target their efforts to relax the definition of weapons designed for war. In light of the recent efforts by the Justice Department to limit those seeking asylum from dangers in their homeland, the change in the rules is as much an immigration issue as it is an arms control issue.

As of: November 29, 2018 Tracking No. 1k2-93op-zrcw Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0069</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Im 60 years old and semi-retired. I operated a gunsmith shop in my early twenties but gave it up to better support my family. However, I always intended to go back to gunsmithing later in life. Finally that happened, I spent quite a bit of money that would have funded my retirement starting my business. I had a new building built, I bought and learned to use 3 manual lathes and a mill with the intention of getting a manufacturers FFL and making a few custom firearms a year, restoring and selling a few older firearms a year and doing general repairs. I figured I would make \$5000 to \$10,000 a year to supplement my retirement while doing a job my community needed. I probably spent \$85,000 or so on my building, equipment and tools.

However, the Obama administration changed the interpretation of the ITAR rules and started requiring holders of FFL-07 licenses (manufacturing FFL) to send nearly \$3000 per year to the state department in ITAR fees. This could well have been half or more of my yearly profits and meant I had to settle for a type 01 FFL and be a gunsmith only. At that time, as a gunsmith I could do nearly any repair, customization or improvement for a customer on his/her firearm but could not improve, customize or refinish a firearm and then sell it as that would make me a manufacturer. Although this wasnt the future Id worked towards for nearly 40 years, it was better than nothing.

Then, in July of 2016 the Obama administration again reinterpreted the existing rules and decided to bring virtually all the jobs gunsmiths do under the ITAR umbrella. This was obviously intended to bankrupt the nations gunsmiths, and, I suspect to chill pre-election free speech. It did not suppress my free speech but it did cause me to start turning away 90% of my potential customers. Under these rules refinishing firearms and replacing parts is about the only thing a gunsmith is now allowed to do. According to the 2nd Obama reinterpretation of the ITAR rules even making a screw or stock for a 150 year-old firearm could be interpreted as a violation.

Since these rules took effect in July of 2016 I dont believe I have made a monthly profit, even once. Threading barrels, customizing, making stocks, dovetailing sight groves, re-chambering, making obsolete parts and the like are all still banned to my knowledge. And, with the exception of the occasional

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machine shop work, my three lathes and my mill are still idle.

I am again considering closing my shop because of this. My insurance alone is nearly a grand a year and Im not sure how long I can survive while waiting on this to be fixed. Please, lets get the State Department out of the gunsmith business and again allow a gunsmith to make and sell a few custom firearms a year without being bankrupted by ITAR.

As of: November 29, 2018 Tracking No. 1k2-93qd-m69y Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0070</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Maria Carla Condori Bazan

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of nonmilitary firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

As of: November 29, 2018 Tracking No. 1k2-93qr-gnfz Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0071</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Diane Pasta

General Comment

I am Diane Pasta, a Quaker (Religious Society of Friends). As a person of faith and a citizen of the US, I am concerned about gun violence and militarization, which makes everyone less safe. I oppose the proposed rule for the following reasons:

- 1. The proposed rule treats semi-automatic assault rifles as "non-military." But many state and non-state groups use semi-automatic rifles in armed conflicts. We should prohibit civilian possession of semi-automatic rifles and handguns, and larger caliber firearm. Semi-automatic rifles are easily converted to fully automatic firearms. These weapons have substantial military utility, so transfer of these firearms to Commerce Dept.control is inconsistent with Congressional attempts to regulate the export of arms.
- 2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons, limiting its ability to comment on related human rights concerns. Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress' proper role.
- 3. The switch from State to Commerce will mean that the brokers and financiers who arrange shipments of semiautomatic firearms will no longer have a statutory requirement to register and obtain a license, increasing risk of trafficking.
- 4. The rule reduces end-use controls for gun exports. It would eliminate the State Department's Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Government's information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators.
- 5. End-use controls are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter's history. But the transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking.
- 6. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of weapons. We can't have everyone with access to a 3D printer, anywhere, entitled to

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produce a lethal weapon. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms. It is effectively eliminating many means to do background checks on domestic sales and end-use controls on international exports.

- 7. The Commerce Department does not have resources to enforce export controls, even before the addition of 30,000 firearms export licenses as a result of this rule predicted by Commerce. The BIS's enforcement office, with no staff in many parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.
- 8. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.
- 9. This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.
- 10. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control are weapons of choice for criminal organizations in countries that have increased violence. The export of these weapons should be subject to more controls, not less. Thank you for the opportunity to comment on this important matter.

As of: November 29, 2018 Tracking No. 1k2-93r0-sye5 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0072</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Michele Hunn

General Comment

As a parent and member of the Radnor Network to Prevent Gun Violence, I am against this proposed rule. This group was formed by a group of parents after the Parkland terrorist attack who want to help reduce gun violence. Exporting these dangerous weapons is not something we should do. There is too much gun violence in America and it is much safer in other democratic countries in Europe and Asia. And we don't need these weapons to be used against our soldiers and other citizens overseas.

I oppose the proposed rule for the following reasons:

Treats semi-automatic assault rifles as "non-military", despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Dept's Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

Please see attached for more detail.

Thank you for your consideration.

Attachments

Oppositon to Gun Exports

Also I oppose the proposed rule for the following reasons:

- -The proposed rule treats semi-automatic assault rifles as "non-military." But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.
- -The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress' proper role.
- -The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3]

-The rule reduces end-use controls for gun exports. It would eliminate the State Department's Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Government's information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter's history whenever a

manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

- -The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.
- -The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] The BIS's enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.
- -The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.
- -This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[5] The export of these weapons should be subject to more controls, not less.

Michele Hunn

As of: November 29, 2018 **Tracking No.** 1k2-93r1-7vsh **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0073</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: James Samuel

General Comment

I enter this comment in strong support of the rule changes as it would help small manufacturers and individuals innovate and develop technologies and products to make firearms safer, less expensive, more tailored to individual uses/needs, and of better overall quality. The current rules are stagnating individuals that wish to develop ideas in relation to firearms through intentionally burdensome fees and application structures in an attempt to weaken the firearms industry's best source of ideas. Americans sitting at their workbench at home that see a need and fill a need. I would also ask that the rules on suppressors be relaxed in this process as well if possible as they offer no military or tactical advantage and are merely hearing protection devices, the equivalent to the muffler on a car, that protect Americans from injury, not improvements to the function or performance of any firearm as opponents have falsely stated for too many years. Thank you for considering this comment and pushing forward the rule changes.

As of: November 29, 2018 Tracking No. 1k2-93r8-f2cf Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0074</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Phil Steinschneider

General Comment

Amendments to the International Traffic in Arms Regulations are very welcome. As a Type 01 Federally Licensed Firearms dealer, our company has been waiting for this change to happen for several years. It will allow us to expand our operations into manufacturing and export, which will potentially make it possible for us to create new jobs and new opportunities for workers within our company, as well as the various vendors that supply us.

On the other hand, several proposed changes fall short of what we were expecting.

Why are suppressors not being placed on the CCL? These are in common use throughout the United States and in Europe. In some European countries, silencers are not regulated at all, or much less regulated than in the US. Put suppressors on the CCL in order to stimulate innovation among US-based manufacturers. This makes even more sense if suppressors are eventually removed from the National Firearms Act, which is quite possible in the future.

Although automatic weapons are no longer in common use by civilians, this is only due to the Hughes Amendment of the Firearm Owners Protection Act of 1986. This amendment has never been challenged, but is certainly unconstitutional.

It makes no sense to continue leaving firearm technologies that have been around for over 100 years under ITAR. This appears to be a political decision rather than a logical one. Move common automatic weapons to the CCL.

Due to their heavily-regulated nature, automatic firearms will be still difficult to export. Leaving them under ITAR will only hurt the US, as it will continue to constrain less well-heeled small arms manufacturers, who might develop the next Thompson SMG, M1 Garand, or M16. Does no one wonder why automatic firearm technology has been at a standstill essentially for over 60 years?

All of Category I should be moved to the CCL. Items of likely greater concern fall under Category II and Category III. The revisions to those sections will of course depend on the items enumerated in the

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changes.

As a Type 01 FFL, we are looking forward to these reforms in order to acquire a Type 07 license. Because we are a small concern, the ITAR fee has have been a barrier to entry for us. We will still feel constrained by the omission of suppressors and commonly-available automatic weapons from these changes, however. If these had been placed on the CCL, we would have become a Type 07/SOT. Under the current proposal, an 07/SOT will be required still to pay the ITAR fee.

These rules have always been complex, so simplification and clarification are appreciated. Those who would violate them will do it despite these regulations, however. The only companies that benefit from any remaining complex technologies not moved to the CCL are those with the capital and resources to hire entire compliance departments at the expense of productive activity. The time and money wasted complying with ITAR could be so much more effectively used for the development of new technologies and new jobs for Americans.

Nonetheless, these changes are certainly welcome, and will go a long way to help make the American defense industry more competitive in the worldwide defense article marketplace.

As of: November 29, 2018 Tracking No. 1k2-93rk-qnru Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0075</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: peter dobrzanski

General Comment

Small arms and the term 'manufacturing' should be removed from ITAR control. As a gunsmith it has adversely effected my business as to what I can and can not do. For some unknown reason, in the eyes of ITAR regulations, I was considered to be a 'manufacturer' on the world stage allegedly exporting war items to other countries. When in fact, I was just threading muzzles for hunting rifles.

As of: November 29, 2018 Tracking No. 1k2-93rm-vbr3 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0076</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Deborah Massa

General Comment

Please do not give up your responsibility for overseas gun sales to the commerce department. This makes absolutely no sense at all unless we want to become known as the United States of weapons profiteers.

As of: November 29, 2018 Tracking No. 1k2-93se-4nuj Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0077</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Alexa Tomassi

General Comment

To: Secretary of State Mike Pompeo Secretary of Commerce Wilbur Ross

We urge you to reverse the proposed regulations that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere. We have seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence should be made stronger, not weaker.

Sources:

[1] The Washington Post, "The Trump administration wants to make it easier to sell U.S. guns abroad. Here's what you need to know" June 4, 2018. https://www.washingtonpost.com/news/monkey-cage/wp/2018/06/04/the-trump-administration-wants-to-make-it-easier-to-sell-u-s-guns-abroad-heres-what-you-need-to-know/?utm_term=.cdb39dd2a669

[2] Salon, "U.S. gun industry wants a bigger piece of the world's arms trade," June 1, 2018. https://www.salon.com/2018/06/01/u-s-gun-industry-wants-a-bigger-piece-of-the-worlds-arms-trade/

As of: November 29, 2018 Tracking No. 1k2-93sg-lbtv Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0078</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Henry Fairman

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93sg-etzf **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0079</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Welsh

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As gun violence continues to tear lives apart at an alarming rate, we need tougher gun controls now more than ever. The U.S. needs to be proactive in their approach, especially when global security is such an issue. At this point, we're not even being reactive.

As of: November 29, 2018 Tracking No. 1k2-93sg-mdrh Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0080</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Katherine Dru

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 Tracking No. 1k2-93sg-ah2t Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0081</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Lauren Bopp

General Comment

Export license oversight for firearms should remain with the State Department. The proposed rule to move it to Commerce is short-sighted and will only aggravate the crisis we have in this country surrounding firearm deaths. We also must not take away valuable tools that law enforcement have to fight organized crime and terrorism across borders.

I also strongly oppose transferring the cost of processing licenses from gun manufacturers to taxpayers and removing blocks on the 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. This rule only makes sense if you put the profits of gun manufacturers ahead of public safety and the safety of our police and border agents--in other words, no sense at all.

As of: November 29, 2018 Tracking No. 1k2-93sg-mq0o Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0082</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: melissa mellen

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93sh-bcpo Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0083</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Gerald MacKay

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93sh-duam Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0084</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93sh-x9j5 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0085</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93sh-zbl9 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0086</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Abigail B Sivan

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93sh-hsjd Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0087</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Ann O'Connor

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer. More people are being killed and/or terrorized by these weapons. We need to seek a more peaceful world, and this proposal will work against that effort.

Thank you for considering this.

Mary Ann O'Connor

As of: November 29, 2018 Tracking No. 1k2-93sh-6gbp Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0088</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Chris Jones

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93sh-u7m9 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0089</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: JAMES BANNERMAN

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93sh-fqfi Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0090</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Ray Valek

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93si-n5bt Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0091</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Leslie Chain

General Comment

That sounds right. Profit from exporting mass murder everywhere.

As of: November 29, 2018 Tracking No. 1k2-93si-fgat Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0092</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Bill Miller

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93sj-1q37 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0093</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Todd P Silverstein

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93sj-g89l Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0094</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

So the U.S. is another arms dealer, which used to be outlawed?!

As of: November 29, 2018 Tracking No. 1k2-93sj-myxq Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0095</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret StJohn

General Comment

Please, please, please do not transfer oversight of foreign non-military gun sales from the State Department to

the Commerce Department. If we are worried about violent immigrants arriving on our shores, let's don't arm them

before the get here! And if we won't support asylum requests for immigrants, let's don't arm their tormenters in their

home countries. If ever there were an issue that is directly related to homeland security, it is this. And thus not an issue

rightly placed in the purview of the Commerce Department. Moreover, the whole initiative seems a transparent effort by

the gun lobby to increase profits in the industry without regard to public safety. And finally, let's be clear, in no way do I

believe that semi-automatic weapons are not and should not be classified as civilian weapons. I am strongly opposed to

this proposal -- ID: DOS-2017-0046-0001. And we are watching what happens closely.

As of: November 29, 2018 Tracking No. 1k2-93sk-g1vs Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0096</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Ayelet Leibovitch

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

Thank you for your time.

As of: November 29, 2018 Tracking No. 1k2-93sk-thnx Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0097</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Gartner

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93sk-ssdr **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0098</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Follman

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93sk-ek1x **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0099</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Dan Abrams

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93sl-m5j0 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0100</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Debra Aycock

General Comment

I OPPOSE moving export license oversight for firearms from the Department of State to the Department of Commerce.

The proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93sl-dobh Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0101</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Pagano

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93sl-pl1o Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0102</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93sn-b0ej Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0103</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

As of: November 29, 2018 **Tracking No.** 1k2-93sn-t0yu **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0104</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Rainer Gades

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93t2-ga1d **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0105</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Marsha Olsen

General Comment

Please reverse the proposed regulations that will make it easier to export semi-automatic weapons and ammunition. We should not eliminate Congressional oversight of these sales. There is a reason that we need Congressional oversight in order for ALL American voices to be heard. We must not weaken enduse controls and enable production of 3D weapons anywhere. We have seen the effects of these weapons in U.S. shootings, particularly in our schools. We must not be partly responsible for killings of innocents in other countries. U.S. export controls for weapons used in violence should be made stronger, not weaker.

As of: November 29, 2018 Tracking No. 1k2-93t3-1u0w Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0106</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: James DeJager

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93t5-5on7 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0107</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: matthew cazier

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

Thank you,

Matthew Cazier, RN, BSN, CCRN TSICU, HMC 206-744-3510 mcazier@uw.edu

As of: November 29, 2018 Tracking No. 1k2-93t6-yp9t Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0108</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Naya Fross

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93t7-25xg Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0109</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Driscoll

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93t9-xltr **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0110</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Paula Claycomb

General Comment

I urge you to pass the proposed rule to restrict the sale of bump-fire stocks, like those used in the Las Vegas massacre. Please do so. No civilian in the US needs to use bump stocks!

As of: November 29, 2018 **Tracking No.** 1k2-93tg-dilz **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0111</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Carolyn Liesy

General Comment

I am not in favor of loosening regulations!

As of: November 29, 2018 **Tracking No.** 1k2-93ta-ea17 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0112</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: ALBERT FOER

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93sn-8fir **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

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Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0113</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Marlene Bressler

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93sp-bwht Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0114</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: beth bennett

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93sp-83k6 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0115</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93sp-hhrz **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0116</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Alice Gelman

General Comment

Hi, my name is Alice and I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other "conversion devices" that enable semiautomatic weapons to mimic automatic fire, qualify as "machineguns" under the National Firearms Act and are generally illegal to possess.

On the night of October 1, 2017, a gunman opened fire from a hotel room on the 32nd floor of the Mandalay Bay hotel into the 22,000 person crowd at the Route 91 Harvest country music festival in Las Vegas, Nevada, killing 58 people and injuring more than 500. The gunman fired more than 1,100 rounds of ammunition in 11 minutes, using semiautomatic rifles modified with dangerous firearm accessories designed to dramatically accelerate the rate of fire, commonly known as "bump-fire stocks." These devices are intended to circumvent the restrictions on possession of fully automatic firearms in the Gun Control Act of 1968 and the National Firearms Act of 1934 by allowing an individual to modify a semiautomatic rifle in such a manner that it operates with a similar rate of fire as a fully automatic rifle. Bump stocks and similar "conversion devices" that accelerate the rate of fire of a semiautomatic firearm are extremely dangerous and pose a substantial risk to public safety.

In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that conversion devices like bump-fire stocks are included in the definition of "machinegun" under the National Firearms Act of 1934. And then Congress must act as well to ensure that manufacturers cannot continue to endanger public safety by designing devices that imitate machine guns and subvert the law. The continued presence of these dangerous devices puts all of our communities at risk and both Congress and ATF must take action quickly to address this threat.

Thank you, Alice

As of: November 29, 2018 **Tracking No.** 1k2-93sp-yc97 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0117</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Claudia Reyes

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93t4-xk7o Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: <u>DOS-2017-0046-0001</u>

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0118</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Zitzman

General Comment

to: The US Department of State

re: Proposed Rule: International Traffic in Arms Regulations, US Munitions List Categories I, II, and III

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

Sincerely, Robert Zitzman

As of: November 29, 2018 Tracking No. 1k2-93t4-11nc Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0119</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: William Castner

General Comment

Kindly accept this comment in strong opposition to this proposed Rule. Among other reasons, liberalizing the export of firearms to foreign countries may allow terrorists to have easier access to firearms without sufficient foreign safeguards in place. If the U.S. government were to allow the gun industry to experience substantial profits due to this rule change at a minimum it should secure assurances & best practices from gun manufactures to keep US citizens safer such as assurances against sale of firearms to retailers with a record or suspicion of gun trafficking.

As of: November 29, 2018 Tracking No. 1k2-93t6-mvv3 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

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Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0120</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

Thank you, Margaret MacDonald

As of: November 29, 2018 Tracking No. 1k2-93tf-2aos Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0121</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Benedek Nyikos

General Comment

The United States should be passing stricter gun control laws, not attempting to make it easier to distribute weapons of war abroad. Our nation should not be making the world less safe by putting dangerous weapons in civilian hands.

As of: November 29, 2018 **Tracking No.** 1k2-93t7-02d7 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0122</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Brian Pushic

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93tj-x7kh **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0123</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Bruce Olsen

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93tt-37wb Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0124</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Eric Milgram

General Comment

I am strongly opposed to this proposed rule change. The USA has the highest homicide rate among its industrialized peers, and more than 70% of those homicides are committed with legally purchased firearms that are mass marketed as a consumer product here in the USA. Furthermore, military patterned rifles, such as the civilian version of the AR-15 are essentially street legal versions of the rifles carried by our soldiers into battle. These rifles are preferred by mass killers because of their inherent characteristics that were specifically designed to make soldiers more lethal.

The State Department is much better equipped than the Commerce Department to oversee small arms exports. Transferring this important oversight function to the Commerce Department will export America's severe gun problem to other nations, with the only benefit being increased profits for America's firearms industry.

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As of: November 29, 2018 Tracking No. 1k2-93tv-aq4j Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0125</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Charles Rice

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93tv-u8yc **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0126</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Charles Rice

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93tx-h1wa **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0127</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93tz-i8z9 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0128</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Dianne Celuch

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93u0-54wj **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0129</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: ALEXANDRA DRISCOLL

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93u3-ftql Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0130</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Nick Politzki

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-4htr **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0131</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Sam Todd

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-3fv1 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0132</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kate Sherwood

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-ktcz **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0133</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Meredith West

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-riym Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0134</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Shawn Lyon

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-xwar Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0135</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Carla Tischio

General Comment

I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other "conversion devices" that enable semiautomatic weapons to mimic automatic fire, qualify as "machineguns" under the National Firearms Act and are generally illegal to possess.

On the night of October 1, 2017, a gunman opened fire from a hotel room on the 32nd floor of the Mandalay Bay hotel into the 22,000 person crowd at the Route 91 Harvest country music festival in Las Vegas, Nevada, killing 58 people and injuring more than 500. The gunman fired more than 1,100 rounds of ammunition in 11 minutes, using semiautomatic rifles modified with dangerous firearm accessories designed to dramatically accelerate the rate of fire, commonly known as "bump-fire stocks." These devices are intended to circumvent the restrictions on possession of fully automatic firearms in the Gun Control Act of 1968 and the National Firearms Act of 1934 by allowing an individual to modify a semiautomatic rifle in such a manner that it operates with a similar rate of fire as a fully automatic rifle. Bump stocks and similar "conversion devices" that accelerate the rate of fire of a semiautomatic firearm are extremely dangerous and pose a substantial risk to public safety.

In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that conversion devices like bump-fire stocks are included in the definition of "machinegun" under the National Firearms Act of 1934. And then Congress must act as well to ensure that manufacturers cannot continue to endanger public safety by designing devices that imitate machine guns and subvert the law. The continued presence of these dangerous devices puts all of our communities at risk and both Congress and ATF must take action quickly to address this threat.

I also am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad

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by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-nlh9 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0136</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Tom Nulty

General Comment

I am writing in strong opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-tns0 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0137</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Silvers

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-lsq5 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0138</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Cheryl Martin

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-95vf Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0139</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Frances Melott

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-d6lk **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0140</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Chuck Graver

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-km5w Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0141</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Brinkerhoff

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-4sbj Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0142</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Gaya Covington

General Comment

I am writing in absolute opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

I also feel that bump stocks should be made illegal!!

As of: November 29, 2018 **Tracking No.** 1k2-93uf-u8wg **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0143</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Armando A. Garcia

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

Thank you for your time and consideration...much appreciated.

As of: November 29, 2018 Tracking No. 1k2-93uf-j0pu Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0144</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Dawn Tripp

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-oa09 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0145</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: BrendaLee Lennick

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer. #MomsDemandAction #StudentsDemandAction #VeteransForPeace #EnoughIsEnough

As of: November 29, 2018 **Tracking No.** 1k2-93uf-rf1g **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0146</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Christine Morrissey

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-rjx3 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0147</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Amanda Cordano

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-vv01 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0148</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: JL Angell

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-t9pk **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0149</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Maija Schaefer

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

I am also concerned that the proposed rule will eliminate Congressional oversight for important gun export deals; transfer the cost of processing licenses from gun manufacturers to taxpayers; and, enable unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This a very serious issue, and should be subject to more safety considerations, not fewer. It should remain under the jurisdiction of the department with the most relevant knowledge and experience.

Thank you for the opportunity to comment.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-wo1m **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0150</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Peggy Kocoras

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military" -- even though US troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also eliminates Congressional oversight for important gun export deals, transfers the cost of processing licenses from gun manufacturers to taxpayers, and enables unchecked gun production in the US and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and lacks the resources to adequately enforce export controls.

Although the current administration views everything on earth as a commodity, some things should not be for sale. Those include semiautomatic weapons. Congress giving up oversight of weapon exports is an abrogation of their responsibilities.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-1ek4 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0151</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Gabrielle New

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-4x71 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0152</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Linval DePass

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-diym Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0153</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Bronstein

General Comment

I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other "conversion devices" that enable

semiautomatic weapons to mimic automatic fire, qualify as "machineguns" under the National Firearms Act and are generally

illegal to possess. In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that

conversion devices like bump-fire stocks are included in the definition of "machinegun" under the National Firearms Act of 1934.

And then Congress must act as wellto ensure that manufacturers cannot continue to endanger public safety by designing

devices that imitate machine guns and subvert the law. The continued presence of these dangerous devices puts all of our

communities at risk and both Congress and ATF must take action quickly to address this threat.

As of: November 29, 2018 Tracking No. 1k2-93uf-5b6z Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

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Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0154</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Denise Berry

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-5jrt Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0155</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Reiter

General Comment

I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other "conversion devices" that enable semiautomatic weapons to mimic automatic fire, qualify as "machineguns" under the National Firearms Act and are generally illegal to possess.

On the night of October 1, 2017, a gunman opened fire from a hotel room on the 32nd floor of the Mandalay Bay hotel into the 22,000 person crowd at the Route 91 Harvest country music festival in Las Vegas, Nevada, killing 58 people and injuring more than 500. The gunman fired more than 1,100 rounds of ammunition in 11 minutes, using semiautomatic rifles modified with dangerous firearm accessories designed to dramatically accelerate the rate of fire, commonly known as "bump-fire stocks." These devices are intended to circumvent the restrictions on possession of fully automatic firearms in the Gun Control Act of 1968 and the National Firearms Act of 1934 by allowing an individual to modify a semiautomatic rifle in such a manner that it operates with a similar rate of fire as a fully automatic rifle. Bump stocks and similar "conversion devices" that accelerate the rate of fire of a semiautomatic firearm are extremely dangerous and pose a substantial risk to public safety.

In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that conversion devices like bump-fire stocks are included in the definition of "machinegun" under the National Firearms Act of 1934. And then Congress must act as wellto ensure that manufacturers cannot continue to endanger public safety by designing devices that imitate machine guns and subvert the law. The continued presence of these dangerous devices puts all of our communities at risk and both Congress and ATF must take action quickly to address this threat.

I remember hearing the machine guns were outlawed so why should we allow a way around this law?

Thank you.

As of: November 29, 2018 Tracking No. 1k2-93uf-9dzn Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0156</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Bronstein

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of

Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that

U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in

armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates

Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to

taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of

firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency

with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which

lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism,

and human rights violations. They should be subject to more controls, not fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93uf-3gv3 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0157</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-wkjo Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0158</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-iq5r Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0159</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Corey E. Olsen

General Comment

I oppose moving export license oversight for firearms from the USA Department of State to the USA Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that USA government troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the USA and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-e8jn Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0160</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Richardson

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uf-tjow Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0161</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret A Go

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ug-x2se Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0162</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: James McMurtrey

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-2v77 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0163</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Lewandowski

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ug-6itx Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0164</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Marian Heidel

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ug-ht6o Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0165</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Angelo Ioffreda

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military" and just another export product, which they most definitely are not. U.S. troops routinely use their weapons in semiautomatic mode. Semiautomatic weapons are used by state and non-state groups in armed conflicts, by drug traffickers and criminal organizations, and the civilian possession of such weapons is prohibited in many countries. The sale of semiautomatic weapons is not a simple commercial transaction.

This misguided proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. The proposed rule also eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

As of: November 29, 2018 Tracking No. 1k2-93ug-6u1n Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

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Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0166</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Dana Tomasello

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ug-knca Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0167</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Gary Collins

General Comment

The national interest of the U.S. is not well served by moving export license oversight for firearms from the Department of State to the Department of Commerce because the wider and less restricted distribution of essentially military weaponry is inimical to the promulgation of international peace and civilian safety, or suppression of misuse of firearms by state and individual actors. The proposed rule change treats semiautomatic assault rifles as "non-military" despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, such weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-29u0 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0168</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Philip Shook

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ug-8bce Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0169</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Tim Fleischer

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ug-mnfn Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0170</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jenna Riggs

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military."

This is clearly what gun manufacturers want to increase sales. Nothing more. Moving the license oversight would be rewarding big donors including the NRA at the cost of human life. Please have a conscience, think beyond profit, and do not reduce oversight of firearms in this way.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-sy9v **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0171</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Greg Collins

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-fi4o **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0172</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Grady Warren

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ug-vg0h Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0173</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Erik McWilliams

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ug-qgug Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0174</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing to STRONGLY oppose moving export license oversight for firearms from the Department of State to the Department of Commerce.

Guns sold for profit contribute to violence around the world as well as in our own country. The US government should be making it MORE difficult to manufacture and export weapons. EVEN if sold to so-called 'friends' of the administration, many end up in the hands of those who use them against American citizens and other innocent people.

Under the proposed rule change semiautomatic assault rifles are treated as non-military. This, despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, despite the fact these weapons are used by state and non-state groups in armed conflicts, and despite the fact the civilian possession of such weapons is prohibited in many countries.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is not and WILL NEVER BE acceptable as the end result of a business model.

Firearms, guns ammunition and related article MUST be subject to more controls, NOT fewer.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-8hin **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0175</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kevin Conway

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ug-rf1q Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0176</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Porter

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-c9dx **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0177</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Weiner

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ug-cxfd Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0178</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Marlene Stalter

General Comment

The proposal weakens controls over semiautomatic assault weapons, .50 sniper rifles, high-capacity ammunition magazines and it may deregulate 3D printing of guns. It could also weaken controls on gun imports.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-lc46 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0179</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Ayres

General Comment

To: Secretary of State Mike Pompeo Secretary of Commerce Wilbur Ross

We urge you to reverse the proposed regulations that would make it easier to export semi-automatic weapons and ammunition,

eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

We have seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack

hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence

should be made stronger, not weaker.

As of: November 29, 2018 Tracking No. 1k2-93ug-t2yd Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0180</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: steve shap

Organization: Road Scholars International

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ug-u8z4 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0181</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: James Talbot

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce and any move that reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Please don't.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-lis7 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0182</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Todd Hartman

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-qhql **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0183</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Randy Harrison

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-319c **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0184</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ug-g9x8 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0185</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Gregory

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ug-1lc8 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0186</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Natalie Sivak

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uh-07ay Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0187</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: James A Clark Jr.

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uh-f1ez Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0188</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Matthew Nugent

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uh-tbv1 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0189</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Belknap

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uh-lday Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0190</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Colleen Wilkinson

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uh-qu6e Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0191</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Richard Thorne

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uh-lya5 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0192</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Fred Granlund

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uh-cha1 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0193</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Michele Biggane

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uh-qbdr Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0194</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Gary Sackett

General Comment

I am writing to oppose the proposal to move the oversight of the firearms export license from the State Department to the Commerce Department. Semiautomatic assault rifles are simply not non-military weapons and their export should remain under the oversight of the State Department. Further, the elimination of Congressional oversight enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

This proposal has been designed by the NRA and the gun manufacturers as a blatant attempt to profit by spreading lethal weapons to a world that needs to reduce the weapons of of violence, not increase them.

As of: November 29, 2018 **Tracking No.** 1k2-93uh-z1wb **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0195</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: William Schultz

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uh-auxf **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0196</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Bristow

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93uh-1972 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0197</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Bristow

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uh-8mz8 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0198</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Michelle Skinner

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of

Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that

U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in

armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates

Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to

taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of

firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency

with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and

which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism,

and human rights violations. They should be subject to more controls, not fewer.

Thank you,

As of: November 29, 2018 Tracking No. 1k2-93uh-qa13 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0199</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Norman Traum

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

As of: November 29, 2018 Tracking No. 1k2-93uh-54dv Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0200</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Jean Hartnett

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uh-gmkr Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0201</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Alexander Honigsblum

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ui-v9jx Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0202</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other conversion devices that enable semiautomatic weapons to mimic automatic fire, qualify as machineguns under the National Firearms Act and are generally illegal to possess.

On the night of October 1, 2017, a gunman opened fire from a hotel room on the 32nd floor of the Mandalay Bay hotel into the 22,000 person crowd at the Route 91 Harvest country music festival in Las Vegas, Nevada, killing 58 people and injuring more than 500. The gunman fired more than 1,100 rounds of ammunition in 11 minutes, using semiautomatic rifles modified with dangerous firearm accessories designed to dramatically accelerate the rate of fire, commonly known as bump-fire stocks. These devices are intended to circumvent the restrictions on possession of fully automatic firearms in the Gun Control Act of 1968 and the National Firearms Act of 1934 by allowing an individual to modify a semiautomatic rifle in such a manner that it operates with a similar rate of fire as a fully automatic rifle. Bump stocks and similar conversion devices that accelerate the rate of fire of a semiautomatic firearm are extremely dangerous and pose a substantial risk to public safety.

In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that conversion devices like bump-fire stocks are included in the definition of machinegun under the National Firearms Act of 1934. And then Congress must act as wellto ensure that manufacturers cannot continue to endanger public safety by designing devices that imitate machine guns and subvert the law. The continued presence of these dangerous devices puts all of our communities at risk and both Congress and ATF must take action quickly to address this threat.

I'm not sure why we even have to petition for this common sense measure. PLEASE DO THE RIGHT THING!

As of: November 29, 2018 **Tracking No.** 1k2-93ui-s9j0 **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0203</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Erica Kaplan

General Comment

I strongly oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ui-k8js Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0204</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Molly Beard

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ui-vhwj Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0205</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Iltis Organization: N/A

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ui-gqgk **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0206</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Kerry Bonner

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 **Tracking No.** 1k2-93ui-f20j **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0207</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Osada

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ui-h1k3 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0208</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: John Raby

General Comment

The last thing we need to do is militarize the Commerce Department as a means of promoting the global arms trade. The world is already awash in weapons, and selling more will only increase the odds that some will never the black market, where terrorists will buy them. This decision will haunt us.

As of: November 29, 2018 **Tracking No.** 1k2-93ui-ikjd **Comments Due:** July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: <u>DOS-2017-0046-0001</u>

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0209</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Elaine Donovan

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93ui-wao7 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0210</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: John Raby

General Comment

The last thing we need to do is militarize the Commerce Department by putting arms sales there. Already, there are too many military-grade weapons in the world, with the accompanying danger that they will flow into the black market, where terrorists will find them. This is an enormously destabilizing idea that will come back to haunt us.

As of: November 29, 2018 Tracking No. 1k2-93uj-uy3e Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0211</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Donohue

General Comment

I am opposed to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uj-gruc Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0212</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Ameesh Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As of: November 29, 2018 Tracking No. 1k2-93uj-g8u2 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0213</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Carole Plourde

General Comment

I oppose moving oversight for overseas arms and munitions sales from the Department of State to the Department of Commerce. If anything we should be selling less weaponry overseas because it will eventually come back to hurt one of our soldiers overseas or wind up in the hands of terrorists.

No more weapons sales to create more havoc and misery in countries across the globe.

Do not give the Department of Commerce the oversight mandate on weapons and munitions. Their mission is to push American goods overseas and not foreign policy.

As of: November 29, 2018 Tracking No. 1k2-93uj-2dka Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories

I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: <u>DOS-2017-0046-0214</u> Comment on DOS-2017-0046-0001

Submitter Information

Name: Christian Biondi

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.